



Claypole Parish Council

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S22/1559 - Allison Homes

Full planning application for the residential development of 46 First Homes and 20 market homes alongside associated site infrastructure, open space and landscaping

Land North of Doddington Lane, Claypole

Claypole Parish Council OBJECT to the above planning application and consider that planning permission should be REFUSED for the reasons set out below.

Executive Summary

- i) Claypole Parish Council submit that the planning permission should be refused as the adverse impacts arising from the proposal would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Local Plan and the NPPF taken as a whole.
- ii) In summary, the concerns of the Parish Council include:
 - The proposal does not represent an appropriate location for development having regard to the policies of the Development Plan and accessibility to services and facilities. There are no grounds for granting permission as an exception to the Local Plan. To grant consent would set a precedent that would undermine the Local Plan and the emerging Claypole Neighbourhood Plan causing widespread anxiety and uncertainty in planning throughout South Kesteven and Claypole;
 - The scale of the proposal is wholly disproportionate to the size of Claypole and it would represent 11.6% increase in the total number of homes; which should be considered cumulatively against the backdrop of Claypole more than doubling in size since 1991

and the planned 7.5% growth already planned for in the emerging Claypole Neighbourhood Plan;

- The scheme does not reflect the form, structure, character and appearance of Claypole and results in harm to heritage assets;
- The proposal does not represent an appropriate location for development having regard to surface water flood risk and has not been supported by the required sequential test;
- It is unclear whether the proposal makes appropriate provision for surface water drainage; and
- The proposal lacks integration and appropriate measures to ensure that it does not adversely affect highway and pedestrian safety.

iii) Claypole is in the north-west corner of South Kesteven and is therefore remote from the main urban centres of the district. Consequently, it is an inappropriate location to meet housing need for first homes as an affordable housing product that predominantly arises from the urban centres of South Kesteven. Claypole lies immediately adjacent to the sustainable urban extension at 'Land around Fernwood' at Newark; Allison Homes are developing at this sustainable urban extension alongside other developers and local need for affordable housing in the catchment of Newark which includes Claypole should firstly be considered to be met in this adjacent sustainable urban extension.

iv) The Neighbourhood Plan process that is underway has demonstrated that this site is the least suitable for development in the village when assessed against a site assessment methodology. There are more appropriate and suitable sites in Claypole which are of a scale proportionate to its size and role as defined as a 'smaller village' which the emerging Neighbourhood Plan is allocating. The Neighbourhood Plan process also allows for the best sites in Claypole to be identified following the principles of a bottom-up community-led approach. The proposal does not have community support.

v) In relation to sites based primarily on the provision of First Homes with an element of market housing, the Written Ministerial Statement (WMS) and Planning Practice Guidance only refers to 'first homes exception sites'. There is no suggestion in the WMS or Planning Practice Guidance that first homes led schemes with market housing should come forward in any other circumstances. As such although the application is not promoted as a 'first

homes exception site', it is considered that it should be judged on this basis. Having regard to the (WMS) and footnote 7 of the NPPF it is clear that areas at risk of flooding are protected areas where 'first homes exception sites' should not be permitted. The application site is an area at risk of high, medium and low risk of surface water flooding, so in principle the site location is unacceptable. The proposal includes a significant proportion of market housing which the WMS and Planning Practice Guidance indicates should only be supported on First Homes Exception Sites where necessary for viability. No such evidence is demonstrated in this case.

- vi) For the reasons we explain in the later sections in full detail; the proposal is considered to be contrary to Policies SD1, SP1, SP2, SP3, SP4, EN5, EN6, DE1 and ID2 of the South Kesteven Local Plan. It also conflicts with paragraphs 2.12, 2.13 and 2.14 of the Local Plan. The proposal also fails to comply with paragraphs 78, 92, 104, 110, 111, 130, 136, 162, 174 and 203 of the National Planning Policy Framework.

Catherine Clarke

Clerk to Claypole Parish Council



Anthony Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIOB, MInstLM, MCMI, MRTPI*

Executive Director - TOWN-PLANNING.CO.UK



Main Planning Issues

1. The main planning issues in this case are considered to be whether the planning application constitutes:
 - an appropriate location for development having regard to the policies of the Development Plan relating to accessibility to services and facilities and the form, structure, character and appearance of Claypole;
 - an appropriate location for development having regard to flood risk;
 - a proposal that has appropriate provision for surface water drainage; and
 - a proposal that does not adversely affect highway and pedestrian safety.

Public Opinion

2. At the recent Parish Council meeting, a substantial public attendance took place with numerous concerns regarding the proposed development being expressed by local residents in the public participation period. It is understood that a group of local residents have organised a petition in objection to the planning application, which we understand is to be sent to South Kesteven District Council.
3. Although the petition is not connected with the Parish Council, we understand that as at the 13th September 2022 a total of 483 signatures have been obtained. The 2020 ONS population estimate for Claypole is 1,354, of which 1,095 are adults. Therefore some 44% of the adult population appear to have signed the petition. **This demonstrates an overwhelming lack of public support.**

Relationship to the Claypole Neighbourhood Plan

4. The submission draft of the Neighbourhood Plan¹ was formally submitted to South Kesteven District Council, under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012², on the 26th May 2022. It is awaiting the commencement of the required consultation under Regulation 16 and the subsequent Independent Examination.
5. The survey of community opinions as a prelude to the preparation of the Neighbourhood Plan was carried in early 2021. It attracted a high 31% response rate and demonstrated a clear view amongst residents that they were fearful of losing their ‘village’ identity. In terms of housing development, they were strongly opposed to large scale development; with a strong preference for a small level of future housing development to maintain

¹ <https://claypole.parish.lincolnshire.gov.uk/downloads/file/135/claypole-neighbourhood-plan-submission-may-2022>

² <https://www.legislation.gov.uk/uksi/2012/637/contents>

Claypole as a sustainable small village and to meet local community needs. In terms of the number of houses those responding to the Neighbourhood Plan consultation considered would be appropriate for Claypole over the plan period; the median figure was 11-15 dwellings.

6. **The submission draft of the Neighbourhood Plan allocates two proposed housing allocations and sets out a strategy to plan for growth of 7.5% over the period from 2021 to 2036. That represents growth of some 43 additional dwellings through commitments, allocations and a small windfall allowance. The Allison Homes proposal would individually represent growth of 11.6% and cumulatively with the Neighbourhood Plan proposals would represent growth of 19.1%, being some 106 additional dwellings.**
7. The Allison Homes proposal would undermine the growth strategy proposed by the Neighbourhood Plan. The South Kesteven Local Plan sets out a strategy based on a median increase in the number of dwellings in the defined ‘larger villages’ of 9.11%. As a defined ‘smaller village’ the Neighbourhood Plan already proposes growth close to the median level of growth proposed for higher tier settlements. As such the Neighbourhood Plan is already looking to deliver an appropriate level of growth for the village.
8. **The Neighbourhood Plan Site Selection Methodology³ assessed thirteen potential housing sites against twenty-one criteria. The Allison Homes site (known as site B in the methodology) was one of the thirteen sites assessed; it scored joint worst of all the thirteen sites assessed.** In addition, parts of site B as put forward by Allison Homes are subject to surface water flood risk (high, medium and low). The NPPF in paragraph 161 is clear that: *“All plans should apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk...”* Consequently, the methodology identifies that there would be the need to also apply the sequential test for allocations because of surface water flood risk. As there are other alternatives that are sequentially preferable for allocation the sequential approach required for development plans would be failed.
9. Allison Homes in the guise of their former name Larkfleet had previously responded to the Neighbourhood Plan ‘call for sites’ offering the site which is the subject of this application. for new housing. They also objected (with Marrons as their agents) to the omission of their site in February/March 2022 when the Regulation 14 consultation on the draft Neighbourhood Plan took place. It is therefore fundamentally misleading for the applicant

³ <https://claypole.parish.lincolnshire.gov.uk/downloads/file/127/claypole-ndp-site-selection-may-2022>

to claim in paragraph 5.39 of their Planning Statement that [since March 2014] “*no further progress in relation to the Neighbourhood Plan is evident*”.

Background on Claypole and Past Levels of Growth

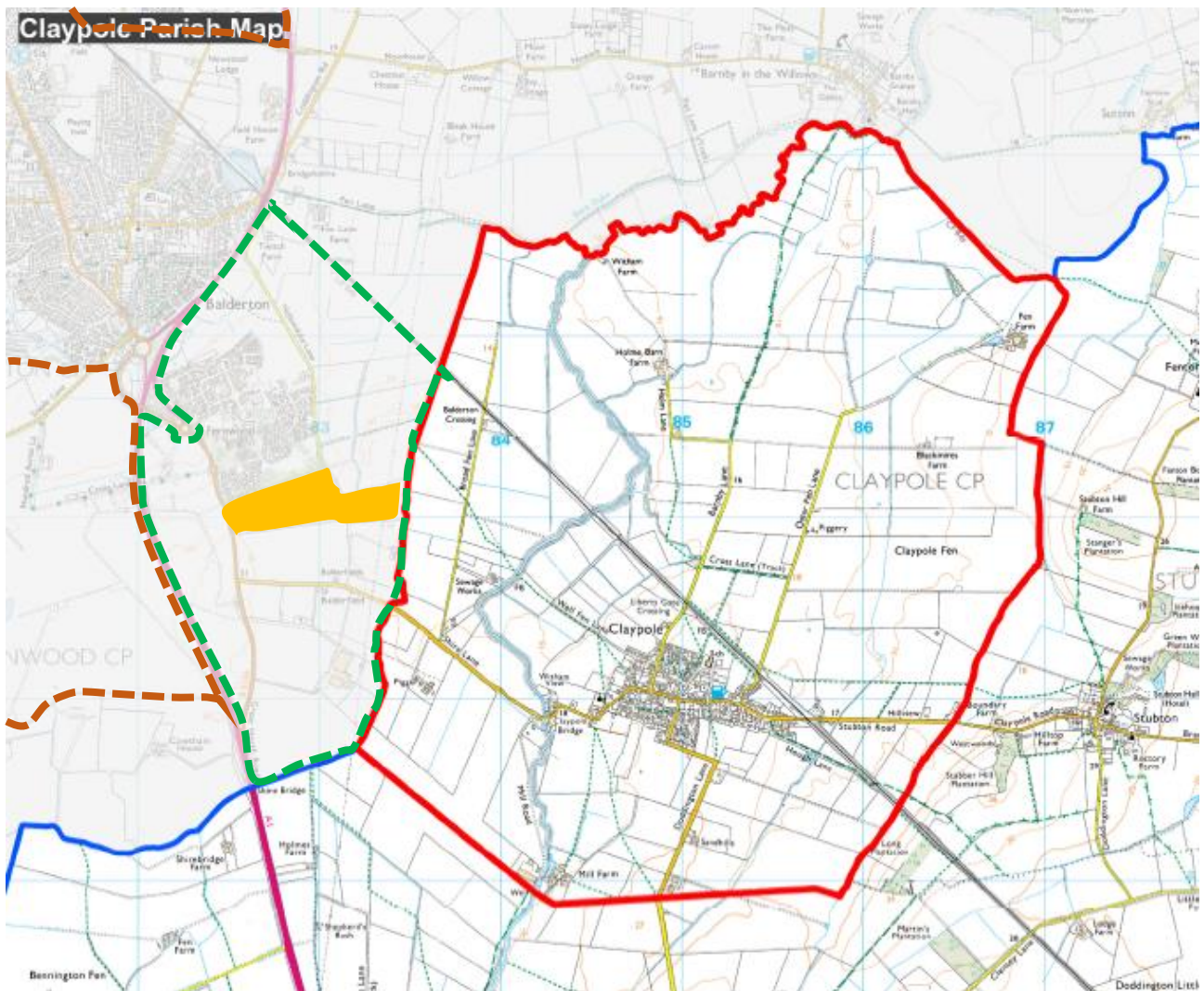
10. Claypole is a village that sits on a minor road that begins at the Great North Road (B6326) and continues to Stubton and villages beyond. The road starts out as Shire Lane, and as it passes through Claypole it becomes Main Street, a street that has changed little in more than 100 years.
11. At the centre of the village the road forms a significant junction with Doddington Lane that provides a route for traffic from Dry Doddington and Westborough wishing to avoid the tricky crossing of the southbound carriageway of the A1 as they continue towards Newark. Claypole is therefore the route for an unusually high level of through traffic, a factor that would be exacerbated by any further development to the south and east of the Doddington Lane/Main Street junction.
12. The name ‘Claypole’ is derived from the Anglo-Saxon and means ‘settlement on clay’. Not surprisingly then, surface water drainage is a major issue within the village. Homes in certain parts of the village regularly suffer from surface water flooding, both in winter when the ground is saturated, and in summer when it becomes baked hard.
13. Claypole is designated as a ‘smaller village’ in Policy SP2 of the South Kesteven Local Plan (adopted on the 30th January 2020). However, notwithstanding its position in the fourth and lowest tier of the settlement hierarchy, Claypole has not been immune to housing development. **In recent decades the village has more than doubled in size from around 250 dwellings in the early 1980s to 570 dwellings at the present time.**
14. The number of dwellings in Claypole has increased principally through three largescale housing developments (Moore Close, Swallow Drive and Wickliffe Park) together with to a lesser degree several infill sites. These newer dwellings have included starter homes and affordable housing including a rural exceptions scheme for 10 dwellings on Barnby Lane approved under S12/1374.
15. Data provided by South Kesteven demonstrates that from 1991 to 2018/2019 that a total of 291 dwellings have been completed in Claypole. This represents an increase of over 104% during that period.

16. Successive Development Plan Documents have designated the village as not being a location for growth. Nonetheless significant levels of growth have occurred. The magnitude of development in Claypole, during recent decades is illustrated by the table at Appendix 1. Figures supplied by the Planning Department show home completions in Claypole since 1990; these have been compared with two villages that have been designated as a 'Local Service Centre' or 'Large Village' during the whole of this period. These other two villages, Barrowby and Caythorpe are locations where their designation means that growth was planned to occur.
17. It will be seen that despite the categorisation of Claypole, there have been almost three times the number of home completions in Claypole compared with Barrowby, and more than 2.5 times more homes completed in Claypole compared with Caythorpe. This provides clear evidence that development rates in Claypole have been disproportionately high for its status. This helps explain the concern of Claypole residents that the village is becoming in danger of losing its identity and local distinctiveness.

Relationship to Strategic Growth in Newark

18. To the west of Claypole, located some 5 miles away, is the town of Newark on Trent, the main employment and commercial centre, and transport hub for Claypole residents.
19. Newark is located within the adjacent district of Newark and Sherwood and it is an identified 'Sub-Regional Centre'. It is identified for strategic growth which includes three strategic urban extensions all on the Claypole side of Newark which have been identified in their 2019 Core Strategy as being phased to cater for housing need up to 2033 and indeed beyond. During the plan period the three strategic urban extensions will deliver 4,885 dwellings, with a further 2,465 dwellings phased for post 2033. In strategic terms therefore the Newark area has an oversupply of allocated housing for current requirements.
20. One of the three strategic urban extensions is 'Land around Fernwood' for some 3,200 dwellings (2,095 up to 2033 and 1,105 post 2033). This strategic allocation abuts the Claypole parish boundary as shown on the plan below. Of the 3,200 new homes allocated for Fernwood, around 2,150 of them will be either side of Claypole Lane (as referred to in the Newark & Sherwood Core Strategy but is actually called Shire Lane on OS maps). As such planning decisions in Claypole need to take into account the inter-relationship to Fernwood and Newark.

21. The three strategic urban extensions at Newark including ‘Land around Fernwood’ will offer a large choice of housing sizes and types including starter homes, affordable homes and homes for older residents. It is also planned to ensure that housing growth is balanced against suitable growth in infrastructure and services & facilities. Allison Homes has Reserved matters consent for the construction of 350 dwellings under 19/01053/RMAM approved on the 24th September 2020. That site abuts the Claypole parish boundary and is 0.8 miles from the eastern edge of Claypole village itself. That site is currently under construction.



- Claypole Parish Boundary
- Lincolnshire/Nottinghamshire Border
- Fernwood Strategic Housing Allocation
- Other Newark Strategic Housing Allocations
- Allison Homes Site in Sustainable Urban Extension under construction

22. The expansion of Fernwood is central to Newark & Sherwood housing strategy and numerous planning permissions have been granted for the expansion. The development of

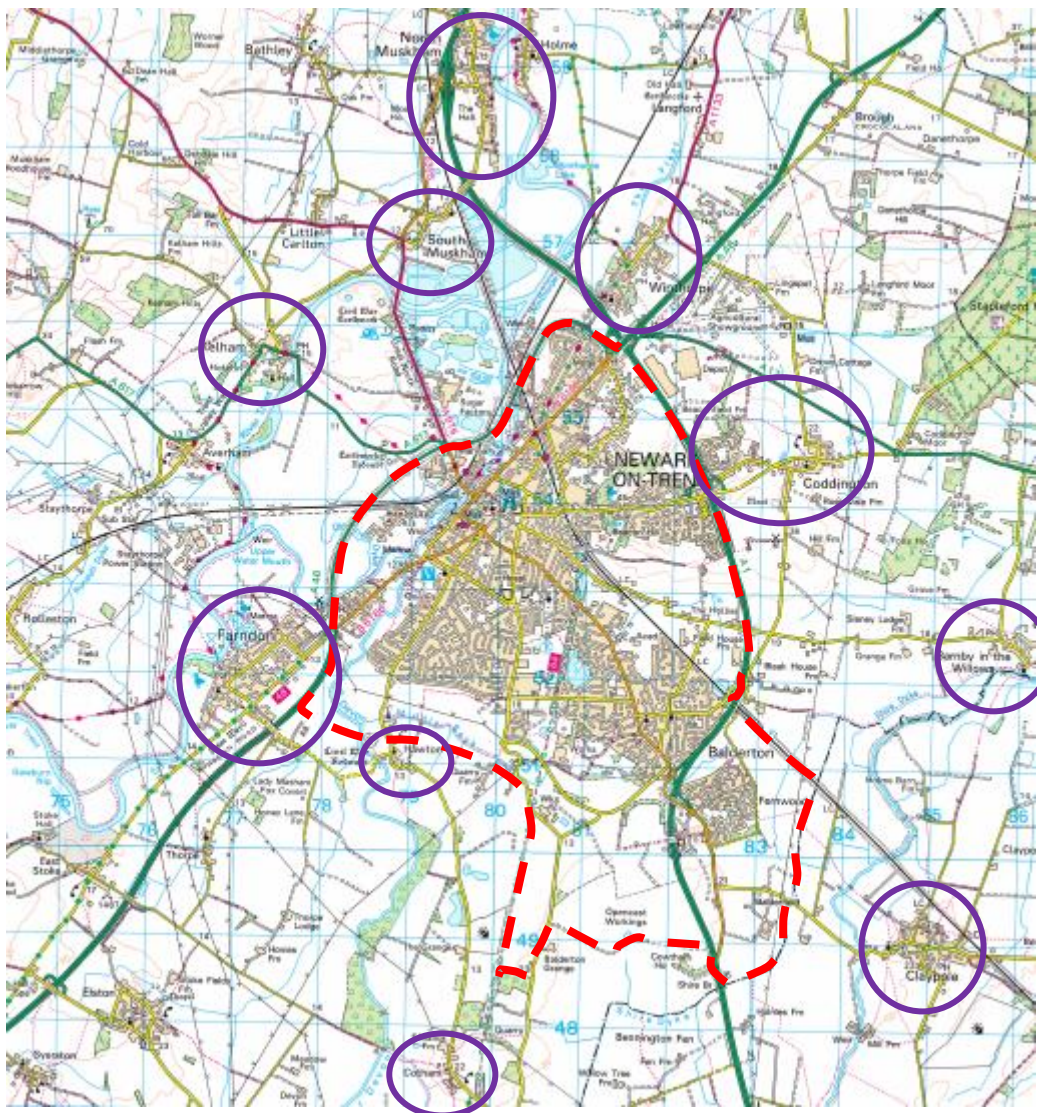
'Land around Fernwood' has the potential to have a significant impact on Claypole including:

- Impact on the rural and village nature of Claypole, bringing the village physically closer to the Newark conurbation with only 1km between the eastern edge of Fernwood and the western edge of Claypole; and
- Significantly increase the volume of traffic through Claypole, in both directions, as Fernwood residents seek a short cut to the A17 avoiding the A1 and the problematic junction with the A1/A46 and A17; a prospect causing major concern to Claypole residents given levels of existing on-street parking which residents in Claypole are reliant upon.


23. The development of 'Land around Fernwood' will not provide any benefits to Claypole residents such as provision of a direct footway or street lighting between Claypole and Fernwood to facilitate walking or cycling; or improved bus services to Claypole.


24. In addition to strategic growth in Newark, it is important to recognise that the Newark and Sherwood Core Strategy seeks to limit the growth of the rural settlements around Newark by designating them as 'other settlements'. In such settlements no growth is allocated and only small-scale development within the village is permissible; this does not allow for development on the edge of those villages. This includes Coddington and Farndon which are larger villages than Claypole and North Muskham which is a similar size to Claypole.

25. Although over the County boundary in Lincolnshire; Claypole is included as part of a ring of the first line of villages around Newark which encompasses (going clockwise): Winthorpe; Coddington; Barnby in the Willows; **Claypole**; Cotham; Hawton; Farndon; Kelham; South Muskham; and North Muskham. Claypole is the only village in this ring that is actually outside the control of the Newark and Sherwood Core Strategy. However, the South Kesteven Local Plan in designating Claypole as a 'smaller village' is consistent in its approach with the Newark & Sherwood Core Strategy towards supporting only small-scale development in Claypole.



Newark Urban Area and Ring of First Villages Surrounding Newark including Claypole

 Approximate Extent of Newark Urban Area Including Urban Extensions

 Ring of First Villages

26. Although in South Kesteven, Claypole looks to the Newark urban area to provide its key services and facilities and as a village its housing market is tied to Newark. The location of Claypole in the very north-west of South Kesteven means that it is poorly related to the urban centres of the district.

27. As such given the over-supply of housing in the Newark Area already allocated, the provision of a substantial number of affordable homes in Claypole, has the potential to undermine the balanced approach in the Newark & Sherwood Amended Core Strategy (March 2019).

28. Claypole lies immediately adjacent to the sustainable urban extension at 'Land around Fernwood' at Newark; Allison Homes are developing at this sustainable urban extension

alongside other developers and local need for first homes and market housing in the catchment of Newark which includes Claypole should firstly be considered to be met in this adjacent sustainable urban extension.

First Homes

29. The South Kesteven Local Plan is silent on the issue of First Homes, this is because this is a housing product that has come about subsequently. First Homes are an affordable housing product. Somewhat confusingly the NPPF published on the 20th July 2021⁴ refers to ‘entry-level exception sites’; although in the Written Ministerial Statement made on the 24th May 2021⁵ indicated that ‘entry-level exception sites’ were being replaced by ‘first homes exception sites’ and Planning Practice Guidance⁶ refers to the terminology ‘first homes’.
30. The Written Ministerial Statement (WMS) indicates that First Homes are an affordable housing product and LPAs should secure 25% of affordable housing on sites where affordable housing is required in the form of First Homes. In relation to sites based primarily on the provision of First Homes with an element of market housing, the WMS and Planning Practice Guidance only refers to ‘first homes exception sites’. There is no suggestion in the WMS or Planning Practice Guidance that first homes led schemes with market housing should come forward in any other circumstances. **As such although the application is not promoted as a ‘first homes exception site’, it is considered that it should be judged on this basis.**
31. The application site lies beyond the site approved previously as a rural exception site off Doddington Lane at rural exception site approved for 16 affordable homes. Consequently, it is difficult to see how consideration of this application could be on the basis of anything but as an exception site. Planning Practice Guidance (Reference ID: 70-024-20210524) explains that: *“A First Homes exception site is an exception site (that is, a housing development that comes forward outside of local or neighbourhood plan allocations to deliver affordable housing) that delivers primarily First Homes as set out in the First Homes Written Ministerial Statement.”* On the basis of that definition the proposal would appear to be a first homes exception site.
32. The WMS and Planning Practice Guidance⁷ (Reference ID: 70-025-20210524) indicates that first homes exception sites cannot come forward in designated rural areas as defined in Annex 2 of the National Planning Policy Framework. In these areas rural exception sites

⁴ <https://www.gov.uk/guidance/national-planning-policy-framework>

⁵ <https://questions-statements.parliament.uk/written-statements/detail/2021-05-24/hcws50>

⁶ <https://www.gov.uk/guidance/first-homes>

⁷ <https://www.gov.uk/guidance/first-homes#exception-sites>

are the sole permissible type of exception site. It is understood that Claypole is a designated 'rural area' under The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the East) Order 1997. Accordingly, it would appear that a first homes exception site would not be appropriate in Claypole.

33. The WMS requires 'first homes exception sites' to: *"be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in the National Planning Policy Framework, and comply with any local design policies and standards."*
34. The WMS cross refers to the NPPF in relation to assets of particular importance. As such it is necessary to cross-refer to footnote 7 of the NPPF to fully understand protected areas. Footnote 7 states: *"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 180) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 67); and areas at risk of flooding or coastal change."*
35. Having regard to the WMS and footnote 7 of the NPPF it is clear that areas at risk of flooding are protected areas where 'first homes exception sites' should not be permitted. **The application site is an area at risk of high, medium and low risk of surface water flooding, so in principle the site location is unacceptable.**
36. Planning Practice Guidance (Reference ID: 70-026-20210524) states that: *"For decision making, what constitutes a proportionate development will vary depending on local circumstances. As part of their process for preparing planning applications, applicants should consider engaging a relevant built environment professional to provide advice on the scale of their proposal and also consider proactively engaging with local authorities where possible to discuss their proposals."*
37. As indicated earlier the WMS stated that 'first homes exception sites' were intended to replace 'entry-level exception sites'. The NPPF in paragraph 72 through footnote 35 indicates that entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement.

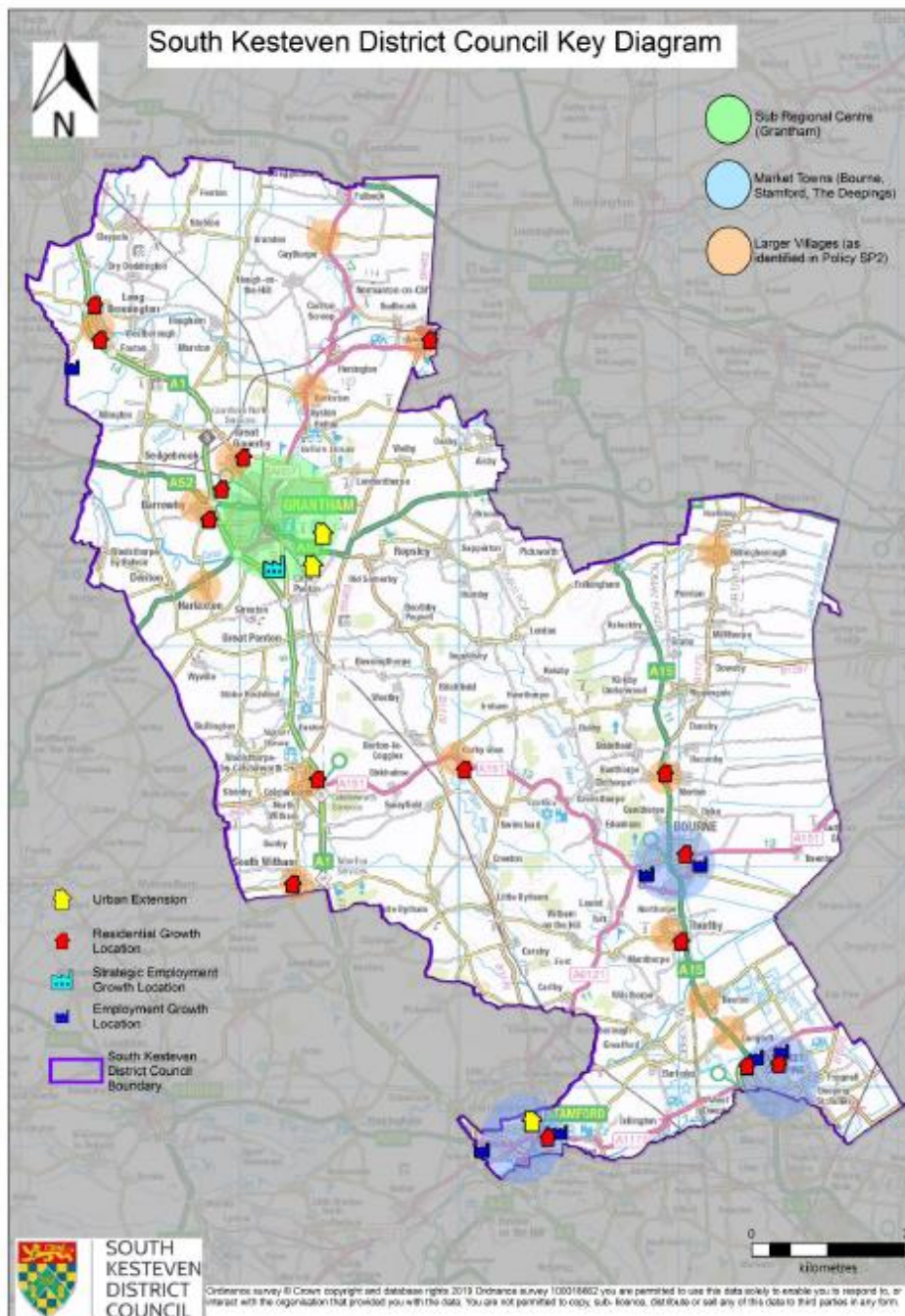
38. The application site comprises an area of 2.9 hectares of greenfield land and at 66 dwellings would represent a 11.6% growth in dwelling numbers against the current baseline of 570 dwellings. The existing built footprint of Claypole measures approximately 36.9 hectares, so a 2.9-hectare site would represent growth in built footprint of some 7.9%. Therefore, by whatever measure chosen, these are far in excess of what the NPPF suggested would be proportionate for an 'entry-level exception site'; this is considered to be relevant as a material planning consideration.
39. As indicated earlier the South Kesteven Local Plan sets out a strategy based on a median increase in the number of dwellings in the defined 'larger villages' of 9.11%. Claypole is a defined 'smaller village' and the proposal put forward by Allison Homes would represent a growth level at 11.6% in a single site that exceeds the median increase in the number of dwellings planned for in higher order settlements. This is considered to further illustrate how disproportionate the scale of proposal actually is.
40. The WMS identifies that *"A small proportion of market homes may be allowed on the site at the local authority's discretion, for example where essential to enable the delivery of First Homes without grant funding."*
41. Planning Practice Guidance (Reference ID: 70-027-20210524) indicates: *"First Homes exception sites can deliver a small proportion of market housing, provided that it can be demonstrated that this is necessary in order to ensure the overall viability of the site. Local authorities and neighbourhood planning groups can set policies that specify in further detail the proportions of market housing would be considered acceptable, and under what circumstances."*
42. The proposal includes 20 market homes, this is some 30% of the overall dwelling numbers. This would seem to be much greater than the envisaged small proportion that the WMS and Planning Practice Guidance suggests might be permissible.
43. Planning Practice Guidance (Reference ID: 70-028-20210524) goes on to state: *"Applications for First Homes exception sites that propose the inclusion of a small proportion of market housing will be expected to provide evidence that the site would be unviable without such housing being included, for instance in situations where the development faces significant and unexpected delivery costs. Evidence would typically be in the form of a detailed viability assessment prepared in line with Planning Practice Guidance on Viability in Decision Taking."* **In this case there is no viability evidence**

submitted at all to seek to justify why the provision of an element of market housing is necessary.

Is the Site an Appropriate Location for Development?

44. As already identified in recent decades the village has more than doubled in size; this is an important context against which to consider further growth. In addition, the inter-relationship to the defined Newark Urban Area and the impact on the balanced approach recently adopted in the Newark & Sherwood Core Strategy needs to be considered.
45. One of the primary considerations is the spatial strategy and associated policies of the Development Plan, together with accessibility to services and facilities.
46. The South Kesteven Local Plan identifies a settlement hierarchy under Policy SP2. Grantham continues to be defined as a Sub-regional centre; the second level in the settlement hierarchy is then the three towns of Stamford, Bourne and The Deepings. The third category of settlement hierarchy is then 15 defined 'Larger villages'; which actually involves 17 settlements as two of the 'larger villages' actually involve multiple settlements. In the Local Plan, Claypole continues to be defined as a 'smaller village'.
47. Claypole lies approximately 8.5 miles from Grantham; 28 miles from Stamford; 23.4 miles from Bourne; and 28.5 miles from The Deepings. As a village it is poorly related to these towns in direct comparison to the approximate 0.6 miles from the edge of the defined Newark Urban Area.
48. Policy SP1 of the Local Plan states: *"The overall strategy of the Plan is to deliver sustainable growth, including new housing and job creation, in order to facilitate growth in the local economy and support local residents. The focus for the majority of growth is in and around the four market towns, with Grantham being a particular focal point. Larger Villages will provide a supporting role in meeting the development needs of the District."* **This strategic policy does not identify any role for 'smaller villages' in delivering the strategic need for housing of any tenure.**
49. Local Plan policy SD1 sets out the broad principles for achieving sustainable development in South Kesteven. The policy requires consideration of a number of issues including the impact of development on climate change, avoiding flood risk, encouraging the use of previously developed land and meeting current and future housing demand. Policy SP1 sets out the spatial strategy for the district and advises that decisions on the location and scale

of new development will be taken on the basis of the settlement hierarchy in policy SP2.



South Kesteven Local Plan Key Diagram

50. In relation to ‘smaller villages’ paragraphs 2.12 to 2.14 of the Local Plan are very clear about the role they should play in delivering small-scale development only. The text states: *“In the Smaller Villages, (as listed in Policy SP2) there is limited capacity to accommodate new development, and whilst previously planning policies strictly limited development in these locations, it is the intention of the Local Plan to allow small, sensitive infill developments (generally expected to be no more than 3 dwellings) so that these smaller*

communities can positively respond to the housing needs of their people and fulfil their role as sustainable communities.

Development proposals on the edge of a settlement will only be supported in the following specific circumstances: where they are supported by clear evidence of substantial support from the local community or; where they form a Rural Exceptions scheme which meets a proven local need for affordable homes. In all cases the site must be well located to the existing built form, substantially enclosed and where the sites edge is clearly defined by a physical feature that also acts as a barrier to further growth (such as a road). The proposal should not visually extend building into the open countryside.

Where it is demonstrated that a proposal meets a proven local need for affordable housing the site should also be small in scale.” (Our emphasis added)

51. **The proposal is not a small-scale infill development and at 66 dwellings it is some twenty-two times larger than the scale envisaged in paragraph 2.12 of the Local Plan. The site is not well related to the existing built form and is not substantially enclosed.** It involves the artificial enclosure of the rear half of a large field to the west measuring 0.6 hectares behind (to the north of) the approved Platform Housing rural exceptions site, which would then undergo pressure for development. The proposal is therefore an obvious pre-cursor to further development which at a density of 30 dwellings per hectare could involve another 18 dwellings. This explicitly contradicts with paragraph 2.13 of the Local Plan which looks for all sites to be clearly defined by a physical feature that acts as a barrier to further growth. The proposal visually extends the proposed development into the open countryside south of Claypole.

52. The proposal cannot be considered by any definition to be small-scale. Although small in scale is not defined in paragraph 2.14 of the Local Plan, an indication of small-scale is given in paragraph 2.12 as being no more than 3 dwellings. In any event the proposal involves 66 dwellings which in planning terms constitutes ‘major development’. Such a quantum of development could not in the context of definitions in the DMPO 2015 or in the context of Claypole be reasonably considered to be small-scale.

53. For ‘smaller villages’ including Claypole, Policy SP2 of the Local Plan states: *“In Smaller Villages as defined below, development will be supported in accordance with Policy SP3, SP4 and all other relevant policies, where development will not compromise the village’s nature and character.”*

54. It is pertinent to bear in mind that in the last 10 years, two rural exception schemes have been permitted in Claypole. A scheme for 10 affordable dwellings on Barnby Lane, now built and called Mallard Close which was approved under S12/1374. Together with a scheme for 16 affordable dwellings on land to the north of Doddington Lane, which is due to be delivered shortly. The village has not and will not therefore be without the delivery of affordable housing already.
55. **The application site is not infill development as it extends the pattern of development substantially beyond the existing built form. Indeed, the site only currently shares one boundary to the existing built form of the village. As such it is not supported by Policy SP3.**
56. Therefore, the most appropriate spatial policy to consider the proposal against is Policy SP4. The policy states that development will be supported provided that it meets the following essential criteria:
- “a. demonstrates clear evidence of substantial support from the local community* through an appropriate, thorough and proportionate pre-application community consultation exercise. Where this cannot be determined, support (or otherwise) should be sought from the Town or Parish Council or Neighbourhood Plan Group or Forum, based upon material planning considerations;*
 - b. be well designed and appropriate in size / scale, layout and character to the setting and area;*
 - c. be adjacent to the existing pattern of development for the area, or adjacent to developed site allocations as identified in the development plan;*
 - d. not extend obtrusively into the open countryside and be appropriate to the landscape, environmental and heritage characteristics of the area;*
 - e. in the case of housing development, meet a proven local need for housing and seeks to address a specific targeted need for local market housing; and*
 - f. enables the delivery of essential infrastructure to support growth proposals.”*
57. Allison Homes have undertaken no pre-application consultation on this latest proposal. The consultation report refers to the previous scheme promoted by Larkfleet who undertook some pre-application consultation on a completely different scheme. Their response rate of 4.8% was very poor. The Neighbourhood Plan questionnaire carried out in February/March 2021 by contrast had a 31% response rate which is very good. The Neighbourhood Plan responses represented 385 people living in the village and the local residents petition involves 483 signatures representing 44% of the adult population.

58. Interestingly the Consultation Statement submitted in support of the proposal does not actually claim that there is clear evidence of substantial support from the local community. As such even Allison Homes acknowledges that the requirements of Policy SP4 have not been met. The consultation statement no longer includes details of numbers of representations in support or objection. However, paragraph 3.40 of the Consultation Statement that accompanied the previous application did indicate that only 7 respondents were supportive of the proposal. That would constitute only 0.5% of the population of the village. This in no way meets the threshold in Policy SP4 of demonstrating 'clear evidence of substantial support from the local community'.
59. **Having regard to the Neighbourhood Plan consultation and the local residents petition are clear that the proposal cannot demonstrate clear evidence of substantial support from the local community.**
60. **The proposal represents a 'bolt-on' to the existing settlement; it does not integrate well into the existing built form of Claypole but is instead an insular development that lacks connectivity.** It lacks any existing physical connectivity into the existing built form and road or footpath network; the proposed 1.6m wide footway link along the northern side of Doddington Lane will result in the harmful urbanisation of Doddington Lane which has an informal rural lane character along the southern side of the village. As can be seen there is a pinch point to the rear of No.33 Moor Close that appears to measure around 0.5m in width which casts doubt on this possibility. Also, it can be seen on the ground that the verge on this corner already experiences vehicles overrunning the verge due to the alignment of the bend and the narrowness of the carriageway.
61. Doddington Lane transitions from a village road to becomes a rural lane just south of Peacock Launde. The change in character here is stark arising from the open vista to the south; the lack of footways; and the narrowing of the carriageway. As the road bends eastwards, the lane has a verdant appearance with a strong open and undeveloped character. It is physically and visually obvious that the village has ended and the countryside has begun. **The proposed site is therefore functionally, physically and visually part of the countryside south of the village. Therefore, the site does not reflect the layout and character of the surrounding area as required by Policy SP4.**
62. The road access off Doddington Lane which is over 300m away from the existing edge of the village at Peacocks Launde. This distance and the unlit nature of this lane will be a barrier to successful integration as future occupiers will not be encouraged to use this route. The site does have a potential foot link via the single narrow footpath alongside

Coulby Close; this is poorly located in the corner of Coulby Close and has the appearance of a path to the bungalow rather than a footway link to land to the south. The distance to the site access from the nearest other built parts of Claypole makes it look like a site that is physically and visually separated from the host community of Claypole. This will reinforce its character and appearance as an isolated and insular development.

63. The NPPF in paragraph 92 a) seeks to: *“promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.”* The proposal conflicts with this advice in that it has been designed as an insular site which lacks integration into the host community.
64. The site only adjoins the existing built form of Claypole on one side to the north, it is separated by a field from the existing built form to the west and still will be even when the Platform Housing scheme is constructed. The south and eastern sides abut open countryside. **Spatially and visually the site is currently part of the open countryside in character and appearance, it has no functional or physical relationship to the existing village.**
65. The development is insular in its layout which lacks integration with the existing built form having only a single narrow footpath alongside Coulby Close which looks more like a path to a front door rather than a main connecting thoroughfare. In that respect spatially and visually it appears to be a distinct ‘estate’ which has been bolted on to a small village, without regard to the form, structure, character and appearance of the village.
66. This physical and visual separation emphasises how the development fails to reflect the form, structure, character and appearance of the village.
67. **Claypole has a limited range of local services and facilities, these do not cater for day-to-day needs.** The village has poor accessibility to higher order services and facilities, there are no footways or cycleways to Fernwood and Newark or to Long Bennington or Caythorpe. The rural and relatively narrow nature of the local road network is not conducive to undertaking journeys on foot or cycle thereby meaning that residents are likely to be unduly reliant upon use of the private car. **Due to the close juxtaposition with Newark, Claypole has limited employment opportunities; there are no business units or similar that provide employment opportunities for use classes B or E.**

68. Claypole has very poor public transport with only limited bus services as follows:

- 22A - school service (term-time only) to/from Grantham schools
- SLE4 - school service (term-time only) to/from Sleaford schools
- 24 - Newark to Grantham (3 buses daytime at 2-hour intervals each way Mon-Sat)

The centre of the proposed site is some 400m from the closest bus stop.

69. There is no General Practitioner surgery in the village, the nearest being Long Bennington and Balderton which is part of the Newark Urban Area; with the nearest pharmacy being in Balderton. The very limited bus services do not provide suitable levels of accessibility to these health facilities, the Balderton Primary Care Centre is over 350m from the bus stop for the No.24 service, meaning that residents would have a combined 1.5km walk if they use the bus to get to/from the Balderton Primary Care Centre. The Doctors at Long Bennington is over 460m from the bus stop for the No.24 service, meaning that residents would have a combined 1.72km walk if they use the bus to get to/from that Doctors.

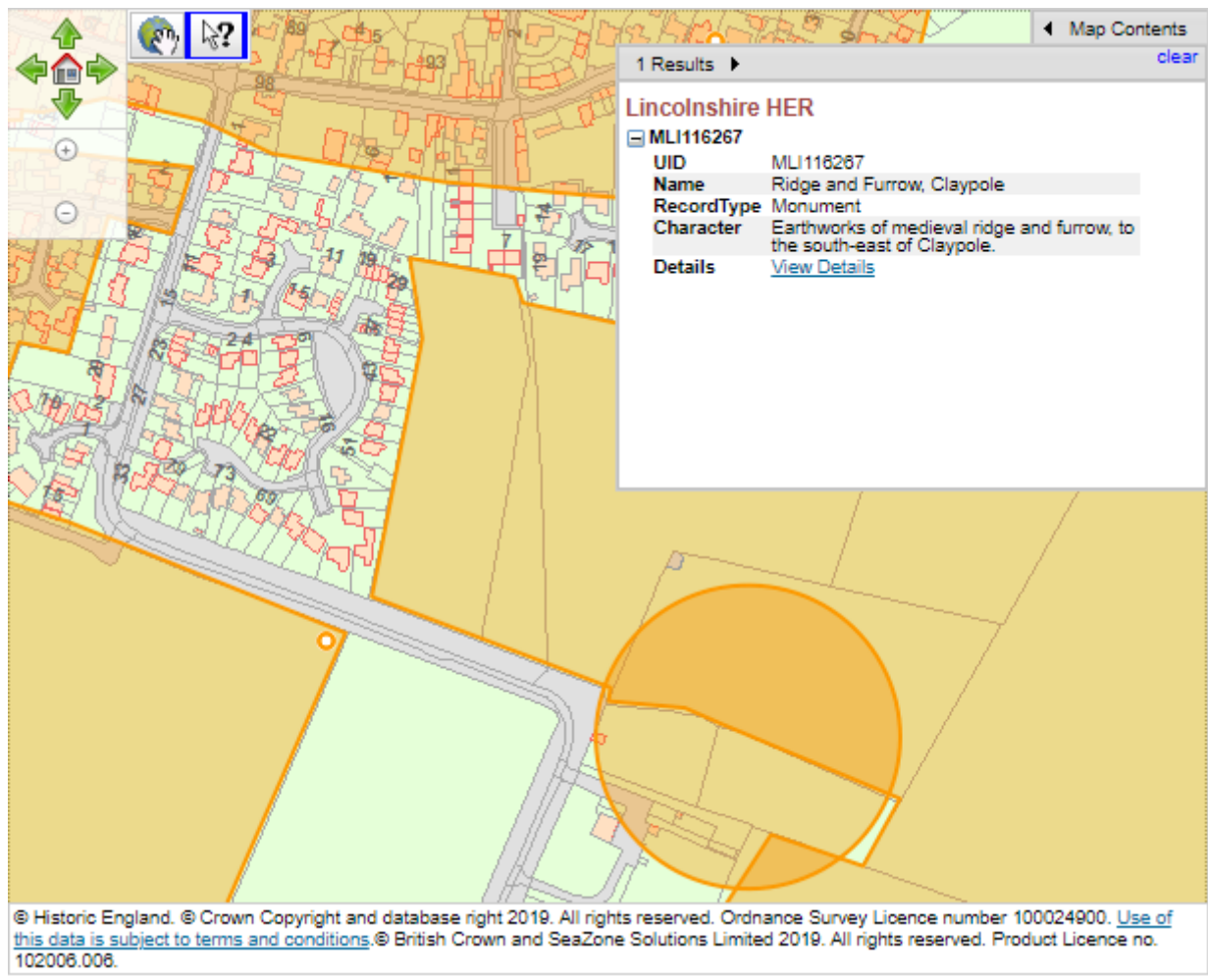
70. The nearest secondary school is at Fernwood which is part of the Newark Urban Area. The closest employment is also at Fernwood; this is why the 'Land around Fernwood' sustainable urban extension is a more appropriate location for balanced growth and development.

71. Policy DE1 (Promoting Good Quality Design) of the Local Plan states: *"To ensure high quality design is achieved throughout the District, all development proposals will be expected to:*

a. Make a positive contribution to the local distinctiveness, vernacular and character of the area. Proposals should reinforce local identity and not have an adverse impact on the streetscene, settlement pattern or the landscape / townscape character of the surrounding area. Proposals should be of an appropriate scale, density, massing, height and material, given the context of the area;"

72. The site does not reinforce local distinctiveness or the character of the village. It is designed as a bolt-on to the village which does nothing to achieve social cohesion and visual integration. It poorly relates to the existing settlement pattern and would result in the urbanisation of Doddington Lane which is a narrow rural lane. **It would result in harm to the established rural character of Doddington Lane and would harm the medieval ridge and furrow landscape that forms the gateway to the southern approach to Claypole. Accordingly, the proposal conflicts with Policy DE1 of the Local Plan.**

73. The site is part of the identified ‘Earthworks of medieval ridge and furrow, to the south-east of Claypole’ on the Historic Environment Record. This ridge and furrow landscape has the HER Number: 30794. The HER describes this as: “*Earthworks of medieval ridge and furrow to the south-east of Claypole, identified on aerial photography by the National Mapping Programme.*”



Historic Environment Record Entry from Heritage Gateway © Historic England

74. The Archaeological Report that supports the planning application submission confirms the presence of ridge and furrow earthworks. The site is part of a much wider area of Medieval (1066 AD to 1539 AD) ridge and furrow landscape to the south of the village. The setting of Claypole is derived in part from the ridge and furrow landscape which has been diminished to an extent by previous development. This is a historic landscape form that has heritage value as a heritage asset that should be protected. This is a factor that further weighs against the proposal. The proposal would harm the landscape heritage characteristics which define the setting of Claypole. In this regard the proposal conflicts with Policy SP4.

75. Paragraph 203 of the NPPF indicates that: *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”* The proposal would result in the loss of a sizeable area of the remaining ridge and furrow landscape; the layout of the proposal would also be likely to lead to pressure for additional development on the remaining part of the field to the north. This would result in even greater harm to the medieval ridge and furrow landscape.
76. Policy EN6 (The Historic Environment) of the Local Plan states that: *“The Council will seek to protect and enhance heritage assets and their settings in keeping with the policies in the National Planning Policy Framework. Development that is likely to cause harm to the significance of a heritage asset or its setting will only be granted permission where the public benefits of the proposal outweigh the potential harm. Proposals which would conserve or enhance the significance of the asset shall be considered favourably. Substantial harm or total loss will be resisted...Where development affecting archaeological sites is acceptable in principle, the Council will seek to ensure mitigation of impact through preservation of the remains in situ as a preferred solution. When in situ preservation is not practical, the developer will be required to make adequate provision for excavation and recording before or during development.”* The proposal would result in the total destruction of the medieval ridge and furrow landscape on the site. This will continue the incremental loss of this landscape setting of the southern side of the village. In this regard the proposal conflicts with Policy EN6.
77. The NPPF in paragraph 130c) requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting. The proposal will not create a strong sense of place which creates development that respects the historic landscape setting of the village or integrates into the existing built form character. Paragraph 136 of the NPPF states that: *“The quality and character of places can suffer when advertisements are poorly sited and designed.”* In addition, the proposal fails to recognise the intrinsic character and beauty of the countryside as required by paragraph 174 b) of the NPPF.
78. Policy SP4 of the Local Plan refers to the requirement for the proposal to meet a proven local need for housing and address a specific targeted need for local market housing. The applicant contends that the scheme will assist the Council in meeting the minimum housing

requirement for the plan period, boosting the five-year housing land supply, and also assist in meeting an identified shortfall in affordable housing.

79. However, criterion (e) of Policy SP4, requires evidence of a proven local housing need and to address a specific targeted need for local market housing. In this respect, the applicant has failed to provide any evidence of a proven need for the level of proposed housing within Claypole and, as such, the proposal is considered to be contrary to Policy SP4(e).

80. On this first main issue the Parish Council conclude that the site is not an appropriate location for development having regard to the policies of the Development Plan. The proposal is not supported by Policies SP1 or SP3 of the South Kesteven Local Plan. It would conflict with Policy SP2; the supporting text in paragraphs 2.12 and 2.13; and Policy SP4 of the Local Plan. These policies seek, amongst other things, that development integrates into the existing built form; respect the character of the area; and not extend obtrusively into the open countryside and be appropriate to the landscape, environmental and heritage characteristics of the area.

81. The proposal further conflicts with paragraphs 92 a); 130 c); 136; 174 b); and 203 of the NPPF. The proposal also conflicts with Policies SD1 and EN6 of the Local Plan which collectively seek, amongst other things, that development protects and enhance the District's character and heritage assets. The site does not reinforce local distinctiveness or the character of the village as required by Policy DE1 of the Local Plan.

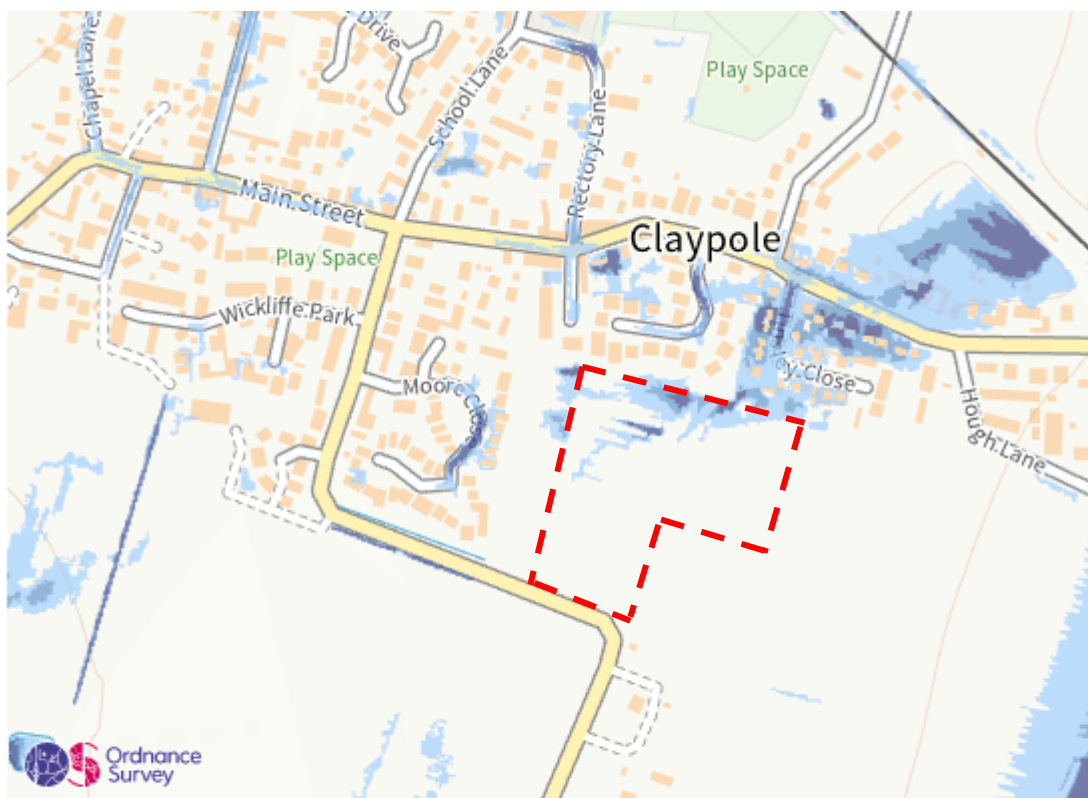
Flood Risk

82. The site is partly at high, medium and low risk of surface water flooding. The Flood Risk Assessment doesn't include a map illustrating the surface water flood risk. We have superimposed the site boundary on the Environment Agency Surface Water Flood Risk Map below.

83. Paragraph 162 of the NPPF is clear that: *"The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach*

should be used in areas known to be at risk now or in the future from any form of flooding.” (Our emphasis)

84. Planning Practice Guidance (Reference ID: 7-023-20220825) has very recently been updated and states: “The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures like flood defences, flood warnings and property level resilience features. Even where a flood risk assessment shows the development can be made safe throughout its lifetime without increasing risk elsewhere, the sequential test still needs to be satisfied.” (Our emphasis)



Extent of flooding from surface water
● High ● Medium ● Low ○ Very low

Environment Agency Surface Water Flood Risk Map

85. It is therefore clear that the sequential test needs to be applied and met not just in relation to river (fluvial) flooding but also in respect to surface water flooding. The

SFRA accompanying the application clearly indicates that no sequential test has been undertaken.

86. Planning Practice Guidance (Reference ID: 7-027-20220825) indicates that the sequential test is required in circumstances where the risk of flooding is high or medium from any source. **Consequently, it is required for this proposal; the failure to apply the sequential test means that the application is contrary to paragraph 162 of the NPPF and associated Planning Practice Guidance. The application also fails to comply with Policy EN5 (Water Environment and Flood Risk Management) of the South Kesteven Local Plan.**

Surface Water Drainage

87. Drainage throughout Claypole is problematic. The clay soil which gives the village its name, becomes saturated in winter months and bakes hard during the summer.
88. Large areas of the old village, especially along Main St have no street drains. Flooding and damage from surface water are well documented throughout the village, not least on Main Street, the site of this proposed development, and adjacent areas.
89. We know from the topographical survey that the field slopes from south to north (from 23.5m AOD to 20.1m AOD), down towards the houses of Redthorn Way and Tinsley Close. This slope means that surface water flooding occurs routinely along the northerly boundary during winter months when the field becomes saturated, and during summer months when the clay bakes hard. This corresponds with the areas shown to be currently at risk of surface water flooding.
90. The houses on Redthorn Way were constructed with an elevation of approximately two metres above the natural level of the previous paddock, and the gardens there, sloping towards the field, form a natural barrier to the flood water which gathers in the field at this point and drains towards the Tinsley Close properties.
91. In June 2006, despite the efforts of home owners and the Fire Service who were called to the scene and pumped water from gardens into the main drain, flood water entered the ground floor of 6 Tinsley Close which is at the lowest point of the gradient. Images at Appendix 2 show that currently flood water gathers where building is proposed to take place. Notwithstanding the existing topographical levels, where the attenuation pond is currently proposed is not where water currently collects naturally.

92. Paragraph 2.6 of the submitted Flood Risk Assessment states: *“A site visit conducted by Millward confirmed that there is no existing drainage ditch to the northern boundary of the site. As low points along the northern boundary are remote from any watercourse, Greenfield run off is currently a potential problem to the residents of the properties to the north of the site under the existing scenario. It should be noted that at the time of visit, heavy rainfall occurred, and a significant amount of ponding / pooling of water was observed throughout the site. A large amount of surface water was visible along the northern boundary, adjacent (and within) the property gardens belonging to Redthorn Way and Tinsley Close. It is therefore highly likely that the natural means of surface water drainage from the site is via infiltration, albeit extremely slow, possibly attributed by fully saturated cohesive soils (further investigation required to confirm).”*
93. The FRA therefore acknowledges that the existing greenfield position results in a surface water run-off problem to neighbouring residential properties. Paragraph 5.2.1 of the FRA confirms that infiltration methods are unsuitable for surface water drainage on this site.
94. It is understood that surface water disposal will need to be via the existing surface water drain as disposal via soakaways will not be feasible. **The published Drainage Strategy Drawing MA10788/200 published in the Flood Risk Assessment is not a comprehensive drainage assessment.** The plan does indicate that a land drain is proposed along the northern boundary to Redthorn Way and Tinsley Close. However, this land drain does not connect into the rest of the surface water drainage network and it is unclear how this is intended to work and function. Given the findings of their own site visit regarding pooling and the impact of Greenfield run-off to the neighbouring properties this is a significant omission.
95. The proposal is to build houses, roads and hard surfaces, which will have the effect of creating impervious surfaces; the impacts will be two-fold. First, less water will be absorbed naturally into the ground and the volume of surface water run-off will increase. Second, the surface water will run downhill at a faster rate causing a more rapid build-up of flood water at the lower parts of the site. **Consequently, it is imperative that the proposed surface water drainage scheme works effectively in order to prevent surface water flooding occurring to neighbouring properties as required by Policy EN5.** The Parish Council is concerned that previous developments have been permitted without adequate surface water drainage measures; given that this is a significant concern to local residents the specialist consultees must be satisfied that the proposed drainage strategy is appropriate.

96. There is anxiety amongst local residents on Tinsley Close in particular that the proposed attenuation pond will not be sufficient in size and capacity, is possibly sited in the wrong place, and that the drainage scheme may not be adequate. There is obvious concern that despite the indication of a land drain, the proposal could worsen the prospect of severe house flooding on Redthorn Way and Tinsley Close; and that seepage from the attenuation pond must be prevented in order to prevent any undermining of the adjacent buildings on Tinsley Close.
97. The drainage strategy is dependent upon the creation of SUDS using what appears to be open swales and an attenuation pond. Proper management of these would be required if planning permission were to be granted. Due to the existing greenfield run-off conditions, it would suggest that the attenuation pond and swales will hold water for much of the year. Whilst these features can assist in enhancing biodiversity care is also needed to ensure that they are not a public safety hazard.

Does the Proposal Adversely Affect Highway and Pedestrian Safety?

98. Paragraph 111 of the National Planning Policy Framework states that: *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*.
99. However, regard also needs to be made to paragraph 110 of the NPPF that states: *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
- a) appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location;*
 - b) safe and suitable access to the site can be achieved for all users; and*
 - c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

100. The proposal is an insular development which is remote from the existing footway network around the village. Although a new footway link along the northern side of Doddington Lane is proposed, there are no proposals in this application to introduce street lighting. The proposed footway extension will therefore be unlit along a narrow single-track road with passing places. Due to the existing boundary treatments, it will not be subject to any

natural surveillance. As such it is unlikely to be favoured as a route for pedestrians to use and future occupiers will therefore be unduly reliant upon use of the private car.

101. The NPPF in paragraph 92 states: *“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;”* The proposed development does nothing to promote social interaction.
102. Paragraph 104 of the NPPF also states: *“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed;...c) opportunities to promote walking, cycling and public transport use are identified and pursued;”* The proposal would conflict with this guidance; the single-track nature of Doddington Lane and the national speed limit would also make it unattractive for cycling, particularly for children. The proposal has failed to ensure that opportunities for sustainable transport are genuinely available to future occupiers as the NPPF seeks.
103. **The village has a poor public transport service which only runs during the middle of the day; and does not run at the times (early morning and late afternoon/early evening) suited to the standard working pattern.**
104. Policy ID2 (Transport and Strategic Transport Infrastructure) of the Local Plan looks to secure a safe transport network which offers a range of transport choices for the movement of people and goods, reduces the need to travel by car and encourages use of alternatives, such as walking, cycling, and public transport. The proposal would conflict with this policy; in particular the following criteria *“a. Are located where travel can be minimised and the use of sustainable transport modes maximised; b. Reduce additional travel demand through the use of measures such as travel planning, safe and convenient public transport, dedicated walking and cycling links and cycle storage/parking links and integration with existing infrastructure;”*
105. The Local Plan through Policy ID2 also includes criterion e) *“Ensure that transport is accessible to all, including appropriate provision for vehicle, powered two-wheeler and cycle parking is made for residents, visitors, employees, customers, deliveries and for people with impaired mobility.”* The proposal includes no cycle parking facilities and the

layout relies upon tandem parking for 35 of the proposed dwellings. Tandem parking is less convenient for occupiers so can result in a greater level of displaced on-street parking. Consequently, the proposed parking facilities are considered not to comply with Policy ID2.

106. Vehicular access via Doddington Lane will increase the number of vehicles using the single width stretch of the road. The bend south of Peacocks Launde means that road users heading south or west cannot see approaching vehicles from the other direction, as such vehicles have to pass on the single width stretch of road.

107. Policy ID2 of the Local Plan requires: *“All new developments should demonstrate that they have applied the following principles:...d. Do not severely impact on the safety and movement of traffic on the highway network or that any such impacts can be mitigated through appropriate improvements, including the provision of new or improved highway infrastructure.”*

108. The proposed access is on a set of bends; this part of Doddington Lane is subject to the national speed limit. On this basis the required visibility splay should be 2.4m by 215m unless lower speeds can be demonstrated.

109. Each of these two bends have been subject to serious accidents, in 2018 on the bend to the west and in 2010 on the bend to the east. The junction of Doddington Lane and Main Street was subject to a serious accident in 2003. Other slight injury accidents have occurred in the road network.

Pedestrian Safety

110. The development is served by only one pedestrian connection via a single narrow footpath alongside Coulby Close which looks more like a path to a front door rather than a main connecting thoroughfare. The only road access is off Doddington Lane which is a narrow single carriageway road without any current footway and the proposed footway will have a pinch point and will be unlit.

111. The site lacks safe pedestrian integration as future occupiers will have to enter/exit the site on foot via the single narrow footpath alongside Coulby Close or a footway that will have a narrow pinchpoint on the corner of Doddington Lane. Coulby Close only has a footway on the western side which does not connect to any footway on Main Street as to the west of Coulby Close the property frontages provide a break in the footway. Also, to the east of Coulby Close the footway does not reach the Close. Therefore, future occupiers

will need to cross Main Street to use the footway on the northern side. There is no dropped kerb crossing present on the northern footway making crossing here unsuitable for anyone with mobility difficulties. This crossing is also adjacent to a crossroads which reinforces the potential for vehicle and pedestrian conflict.

112. In addition, as most of the services and facilities in the village are north of Main Street, pedestrian crossing would be necessary. It would also be necessary to cross Main Street in order to access the bus stop to the west, including a second crossing back across Main Street to catch the bus to Newark. Lacking proper connectivity puts up barriers to the use of sustainable modes of transport which is likely to increase reliance on the use of the private car even for short local journeys. The proposal would conflict with paragraph 110 a) and b) of the NPPF.
113. **The siting of the development is not particularly accessible by public transport, cycling and walking and the barriers to pedestrian connectivity do not promote and assist journeys by public transport, cycling, mobility aids and walking. The pedestrian connections are not accessible, safe, convenient and as attractive as possible. In this regard the proposal fails to accord with Policy ID2 of the Local Plan.**

Highway Safety

114. Vehicular access via Doddington Lane will increase the number of vehicles using the single width stretch of the road. The bend south of Peacocks Launde means that road users heading south or west cannot see approaching vehicles from the other direction, as such vehicles have to pass on the single width stretch of road. Vehicles regularly overrun the inside grass verge at this point due to the poor forward visibility and narrowness of the carriageway.
115. Due to the perfectly reasonable desire of existing residents of terraced properties along Main Street to park their cars outside their homes, a significant stretch of Main Street on a daily basis effectively becomes a single-track road. This is particularly the case from Bes Cottage 59 Main Street to Birchtree Cottage 83 Main Street. This problem is exacerbated by parking changing to the opposite side of the road at numbers 70 to 76 Main St at the junction with Barnby Lane, and again changing sides as cars park for the village shop.
116. Main Street is therefore a pinchpoint for traffic movements, as the majority of households in Claypole are located to the eastern and southern part of the village - specifically the Wickliffe Park and Moore Close developments, dwellings on Doddington Lane, dwellings

on School Lane and Rectory Lane, the continuation of Main Street, and the further roads branching off (Coulby Close, Redthorn Way, Tinsley Close, Osterfen Lane and Hough Lane). The pinchpoint part of Main Street is therefore routinely used by the vast majority of Claypole residents.

117. The on-street parking causes queues at either end of the pinchpoint as vehicles wait their turn to pass through. The parking either side of the road means that vision to the opposite of the parked vehicles is often obscured with the consequence that drivers sometimes proceed when there is no room to do so, or become frustrated. Vehicles sometimes mount the pavement, pedestrians have been alarmed, and minor accidents have occurred when vehicles collide (wing mirrors etc).
118. The on-street parking restricts visibility for pedestrians crossing Main Street and for vehicles emerging from side roads. For example, vehicles emerging from Barnby Lane, whether to turn left or right, have their vision obstructed and have to negotiate their turn to move across queuing traffic with obvious risk. (See Appendix 3)
119. At the Doddington Lane junction with Main Street, cars waiting to travel in the Newark direction frequently park across Doddington Lane, obstructing on-coming traffic that may want to turn right into Doddington Lane, or traffic from Doddington Lane wanting to move straight on into School Lane
120. This junction is a four-way crossroads, due to the above factors vehicles pulling out from Doddington Lane and turning left, frequently halt for on-coming traffic, causing a dangerous situation for cars moving forward on Main Street.
121. When slow moving vehicles enter the narrowed stretch of Main Street, traffic then comes to a halt. This may occur with large farm vehicles, and especially when the refuse collection moves slowly along Main Street.
122. At the Doddington Lane crossroads, there is particular concern at appropriate times of day for the safety of young school children walking from Wickliffe Park and from Moore Close to the primary school on School Lane. Parents have made repeated representations to the Parish Council for safety measures that are beyond our capacity to provide.
123. There are additional safety concerns at Doddington Lane in the early morning and late afternoon when each of the *four* school buses taking children to secondary schools stop to pick up or drop off children. At these times, especially dark winter months, and with

generally dark-coloured school uniforms, there are very real concerns for the safety of children as they negotiate cars and other vehicles using Doddington Lane.

124. The proposal will result in all vehicles of future occupiers being likely to use the crossroads where existing vehicular and pedestrian conflict already arises. As we have identified lacking proper pedestrian connectivity will put up barriers to the use of sustainable modes of transport which is likely to increase reliance on the use of the private car even for short local journeys. Short local vehicle journeys will have to pass through the Doddington Lane junction with Main Street. In relation to highway and pedestrian safety the proposal fails to accord with Policy ID2 of the Local Plan.
125. Local residents are concerned about the scale of the traffic in Claypole, this is best understood by examining traffic volumes. The Parish Council has installed a speed monitor which provides a count of vehicles that pass by. In Appendix 4, charts show counts of vehicles approaching Claypole from Stubton Road, and separately from the Newark end of the village (Shire Lane).
126. Charts 1 and 2 record vehicle movements into Claypole from the direction of Stubton. From that direction almost all vehicles can be assumed to be through traffic for Claypole, heading to the A1 or Newark. The weekly average of through traffic from this direction can be seen to be 4295 vehicles. However, it will be noted from these charts that vehicle numbers in this one direction have been as high as 6913 vehicles, including 2958 vehicles in a single day. During the normal peak hours of 7-10am, on average, approximately 113 cars each day arrive into the village from the Stubton and supplement peak hour 'travel to work' traffic from Claypole towards Newark, although this has been as high as 502 vehicles. In the normal peak hours of 3-7pm the number of vehicles increases to 195 (but has been as high as 2567 vehicles) arriving into Claypole from the east, travelling in the opposite direction to 'return from work' Claypole traffic and thereby adding to the vehicular conflict through the pinchpoint on Main Street.
127. Charts 3 and 4 show vehicle movements into Claypole from the Newark end of the village (Shire Lane), and a much larger volume of traffic travelling into Claypole from Newark and the A1. In this direction, the average number of vehicles entering during the morning peak hours 7-10am is 212, although this has risen to 551; and during 3-7pm there is an average of 638 vehicles in the 4-hour period, although that has risen to 1065 vehicles.
128. The combined effect of these two sets of figures shows that, routinely, between the hours of 3-7pm, along the pinchpoint stretch of Main Street, and at peak times for children

leaving primary school or arriving into Claypole from secondary school, more than 600 vehicles travelling eastwards, meet almost 200 vehicles travelling in a westward direction, causing conflict and presenting significant road safety concerns for local residents.

129. The Parish Council has liaised with the County Highways Department with a view to identifying measures that might in any way ameliorate this issue, although it is accepted that the issue cannot be fully resolved.
130. The impact of the planned creation of more than 3,200 new homes within a mile of Claypole at Fernwood is of major concern to the village. Some 2,150 of these new homes will be built either side of Shire Lane. It is inevitable that significant volumes of traffic from the new developments will use Claypole as a route to the A15, or to Lincoln via Beckingham, in order to avoid the A1 and the problematic junction of the A46 and A15 north of Newark.
131. We are as yet unable to provide statistics for the volumes of traffic that enter Claypole from Doddington Lane, although there is no question that significant numbers of vehicles do use this route from Westborough and from Dry Doddington in order to avoid the difficult right turn across the southbound carriageway of the A1 from Doddington Lane.
132. **Overall, the proposed development is considered to not promote sustainable travel and does not provide adequate vehicle and cycle parking provision and would adversely affect highway and pedestrian safety. In this regard the proposal would conflict with Policies SD1 and ID2 of the Local Plan and paragraphs 92, 104, 110 and 111 of the NPPF.**

Other Matters

133. In relation to other matters Claypole is a settled and sustainable community and none of the local services and facilities are under threat. It has a shop, a butcher, a café, a pub and a primary school. It is noted that the shop has obtained planning permission to replace the existing premises with a new and larger shop. This is not contingent on this development and the shop owner has not indicated any need for the application.
134. The café is thriving and its owners are amongst the objectors to this application. Allison Homes seeks to make great play about the school being under threat, however, the school governors have not supported the application. Although the applicant has claimed a drop-in birth rate will undermine the school, the answer to such temporary fluctuations is not

to build homes when numbers fall. Claypole school is able to cope with these fluctuations. In any event the number of properties in the Long Bennington primary school planning area does not already justify the school place numbers. This demonstrates how the existing capacity is already related to influx of pupils from outside the catchment area, notably from over the County boundary.

135. The development of 3,200 new homes at Fernwood will increase the current number of parents seeking to send their children to Claypole School in order to access Lincolnshire's grammar school system.
136. As the LPA concluded in the committee report on the last application S21/0769: *"While new schools are planned to support the significant residential growth around Newark, it is expected that some families would continue to use Claypole Primary School from within that wider area and therefore support the sustainability of the village primary school regardless of these proposals."* There is no reason to think that a similar conclusion remains valid in relation to this latest proposal.
137. Consequently, this proposal is not large enough to bring any new services to the village, nor will it provide a marginal increase that will determine that new services will be brought to Claypole or existing services improved.

Should Approval be Granted

138. For the detailed reasons set out above the Parish Council considers that planning permission should be refused. Without prejudice to our case however should the LPA disagree it is appropriate to consider matters that would need to be secured through any consent. It is noted that there will be no direct benefit from this development to the village of Claypole and its community. There are two significant areas of expenditure on community amenities - Claypole Community Park and the Village Hall. These would be likely to be extensively used by future occupiers.
139. Claypole Community Park is owned and managed by Claypole Parish Council. It provides a range of sporting and leisure amenities for all ages. Some elements are now completed (a new sports field, a leisure park and adventure play area), but further phases are as yet unfunded (the refurbishments of the tennis courts to create a multi-use games area, a skate board/roller blade park, a sports pavilion, car parking area to avoid on-street parking).

140. Claypole Village Hall was provided by an endowment and is run a trust and management committee. Its survival relies wholly on income from usage. Like many older village halls, it requires significant investment in refurbishment to ensure the amenity remains attractive to potential users. Considerable effort has been made by the hall's management team to generate income which has enabled new toilets to be installed and modest improvements to the internal decoration. The subletting of part of the building to create a coffee shop has provided income to affect the necessary improvements to facilitate that. However, a surveyor's report has indicated the need to replace the roof of the building at a cost of £40,000. In order to make the facility attractive to a wide range of users, the rough car park area also needs to be surfaced.
141. While new residents may bring a modest increase of expenditure to the village's few commercial outlets, they may also participate in activities held in the village hall. Residents may also participate in activities like walking cricket run by Claypole Cricket Club, or tennis, and may wish to use the leisure park for themselves or perhaps grandchildren.
142. The Claypole Community Park development plan has several elements yet to be completed. If the LPA concludes that permission should be granted then The Parish Council would wish to see the allocation of s106 monies to support these community amenities, with the necessary refurbishment and renovations to the village hall being the priority.
143. If approved the inter-relationship to existing development would need to be considered. Off-site pedestrian improvements would need to be secured including dropped kerb crossing facilities on Main Street and the footway along Doddington Lane.
144. If fencing is to be installed along its boundaries with Redthorn Way and Tinsley Close its height needs careful consideration. Such fencing would routinely be at a height of 1.8m to avoid intrusion between houses on the development and neighbouring dwellings at ground floor level. However, the adjoining Tinsley Close properties are at a lower gradient than the Larkfleet site, and there are no planned properties immediately adjacent to this border. A 1.8m high fence would impose an unnecessary and undesired high barrier to the south of these properties causing loss of light. A fence of lesser height would still ensure no visual intrusion between properties on either side. Accordingly, it is requested that the height of new fencing on this border be restricted to a height of 1.2m.

Conclusion

145. For the reasons set out above the proposal is considered to be contrary to Policies SD1, SP1, SP2, SP3, SP4, EN5, EN6, DE1 and ID2 of the South Kesteven Local Plan. It also conflicts with paragraphs 2.12, 2.13 and 2.14 of the Local Plan. The proposal also fails to comply with paragraphs 78, 92, 104, 110, 111, 130, 136, 162, 174 and 203 of the National Planning Policy Framework.

146. As the proposal is considered to be contrary to the policies of the South Kesteven Local Plan and the NPPF. Having regard to s38(6) of the Planning and Compulsory Purchase Act 2004 as there are no material planning considerations that indicate otherwise; the application should be REFUSED.

Catherine Clarke

Clerk - Claypole Parish Council



Anthony Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIOB, MInstLM, MCMI, MRTPI*

Executive Director - TOWN-PLANNING.CO.UK



APPENDIX 1 - HOUSE COMPLETIONS - CLAYPOLE COMPARED WITH LOCAL SERVICE CENTRES

PARISH	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001-02	2002-03
Barrowby	6	0	14	0	0	1	1	6	0	2	2	3
Caythorpe	2	0	0	2	5	10	8	22	19	6	7	5
Claypole	20	4	18	22	10	3	1	23	32	9	7	7
2003-04	1	5	8	2	2	24	0	0	0	1	1	1
Barrowby	17	2	2	1	4	0	0	0	1	0	3	2
Caythorpe	18	46	5	11	5	10	2	5	2	0	19	1
Claypole												
2015-16	4	4	9	1	0	10	108					
2016-2017	0	2	2	1	0	5	128					
2017-2018	0	0	0	1	2	8	291					
2018-2019												
Site Surveys 2006-2010												
Site Surveys 2012-2016												
Total												

APPENDIX 2 - SURFACE WATER FLOODING

1. These images, taken in March 2019, shows the build-up of flood water at the lowest point of the field after unexceptional rainfall.



2. This image, taken from the same position on the same day, shows the relatively dry area where Larkfleet propose to position their drainage pond.



3. Images from floods of June 2006





APPENDIX 3 - ON-STREET PARKING IN CLAYPOLE



Routine resident parking on Main Street, showing continuous lines of parked car on alternate sides of the road created a “chicane” effect.



This image from the Barnby Lane junction shows routine car parking prevents drivers, as they approach the single lane of moving traffic on Main St, from seeing whether a vehicle may be heading towards them, and whether or not it is safe to proceed.



Refuse collection. It can take 10-15 minutes for the refuse collectors to attend to bins on this stretch. The image shows impatient cars queuing behind the collection lorry.



An example of a car veering right, from Main St to Doddington Lane, in front of a car waiting to allow on-coming traffic to pass through the single lane stretch.

APPENDIX 4 - TRAFFIC STATISTICS

Chart 1

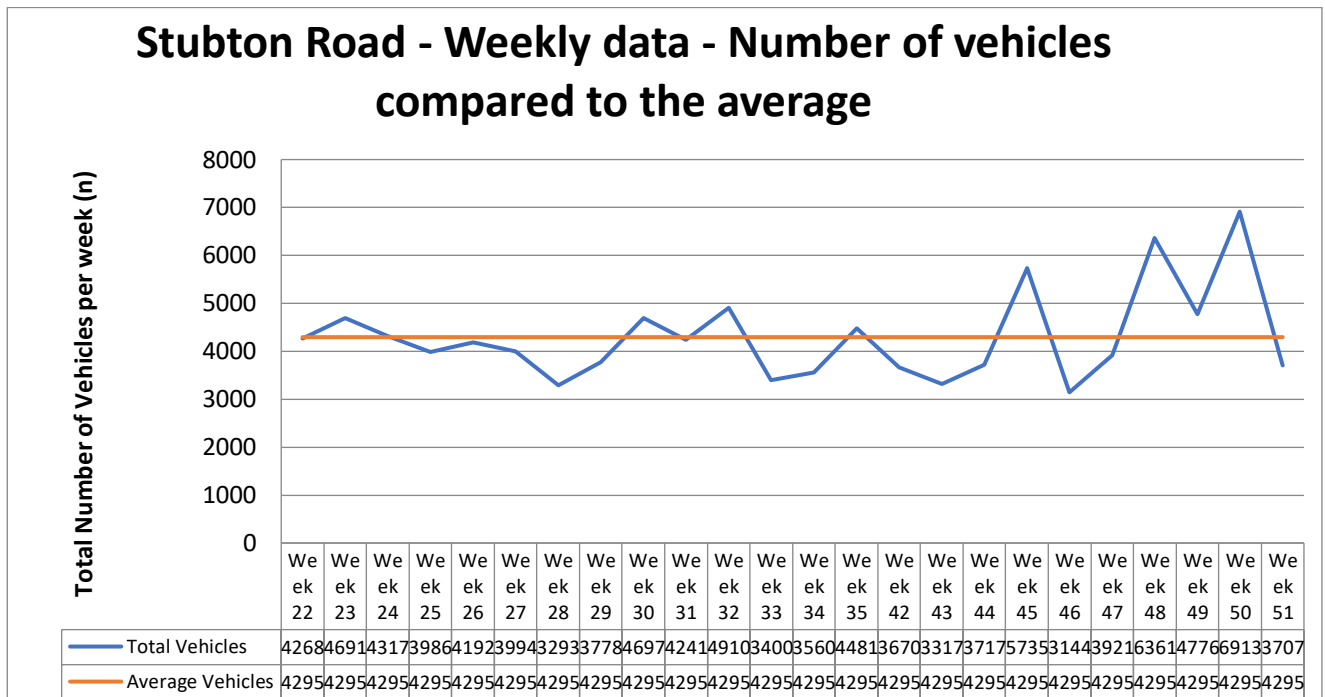


Chart 1 shows an average of approximately 4200 per week vehicle movements into Claypole from Stubton, with a highest recorded 7000 vehicles entering Claypole in a week.

Chart 2

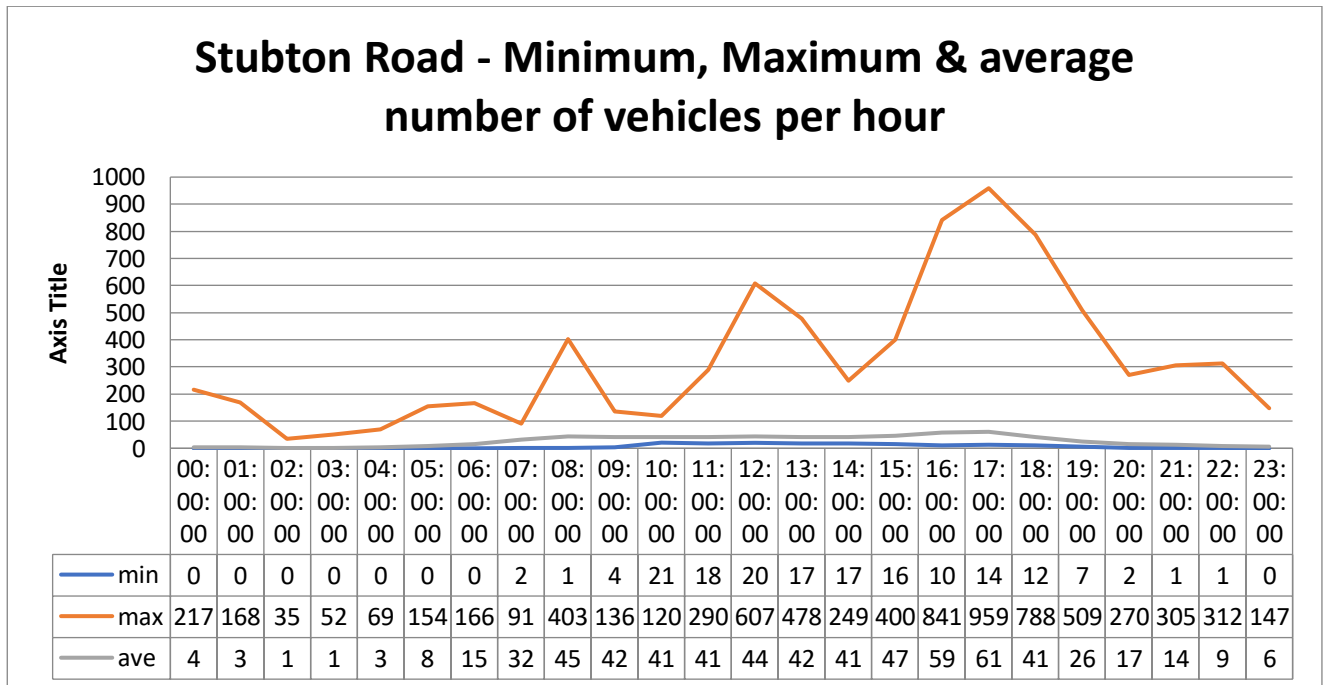


Chart 2 shows average daily traffic numbers entering Claypole from Stubton, peaks times and impact of diversions through the village.

Chart 3

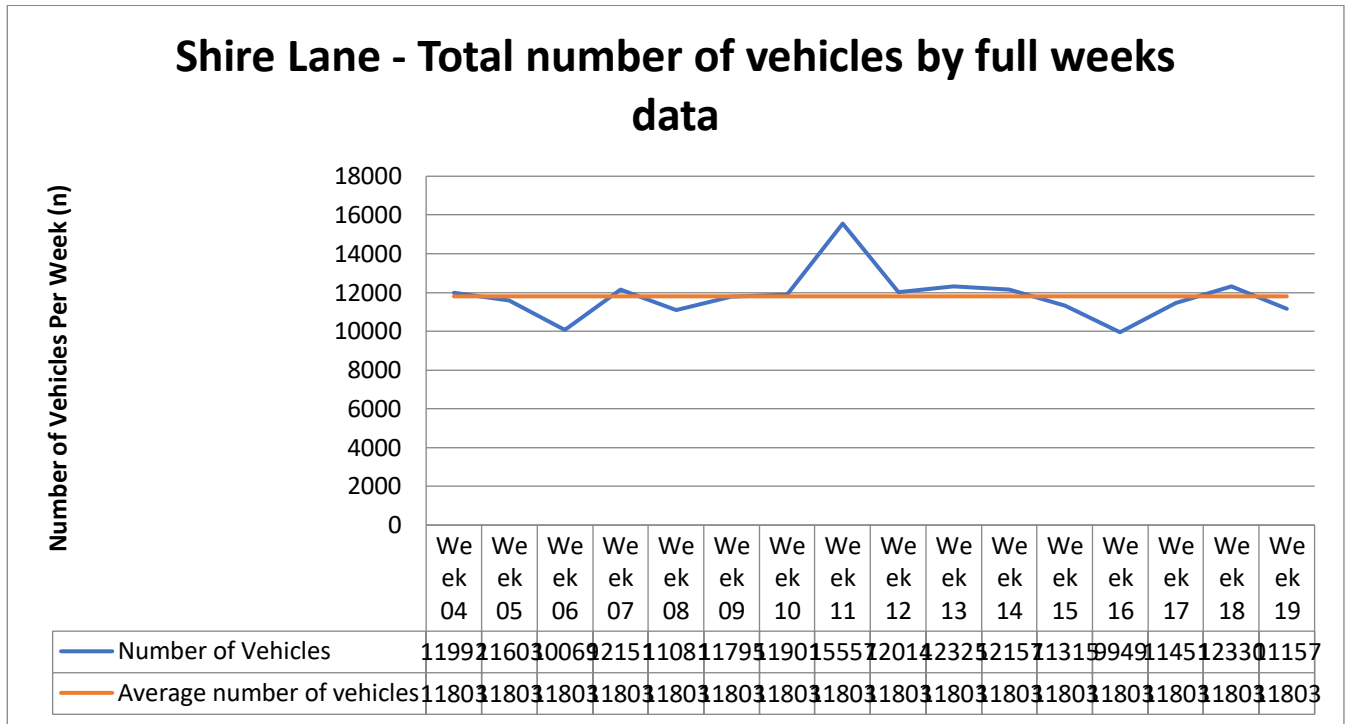


Chart 3 shows an average of approximately 12,000 per week vehicle movements into Claypole from Newark with a high of almost 16,000 vehicles entering Claypole in a week.

Chart 4

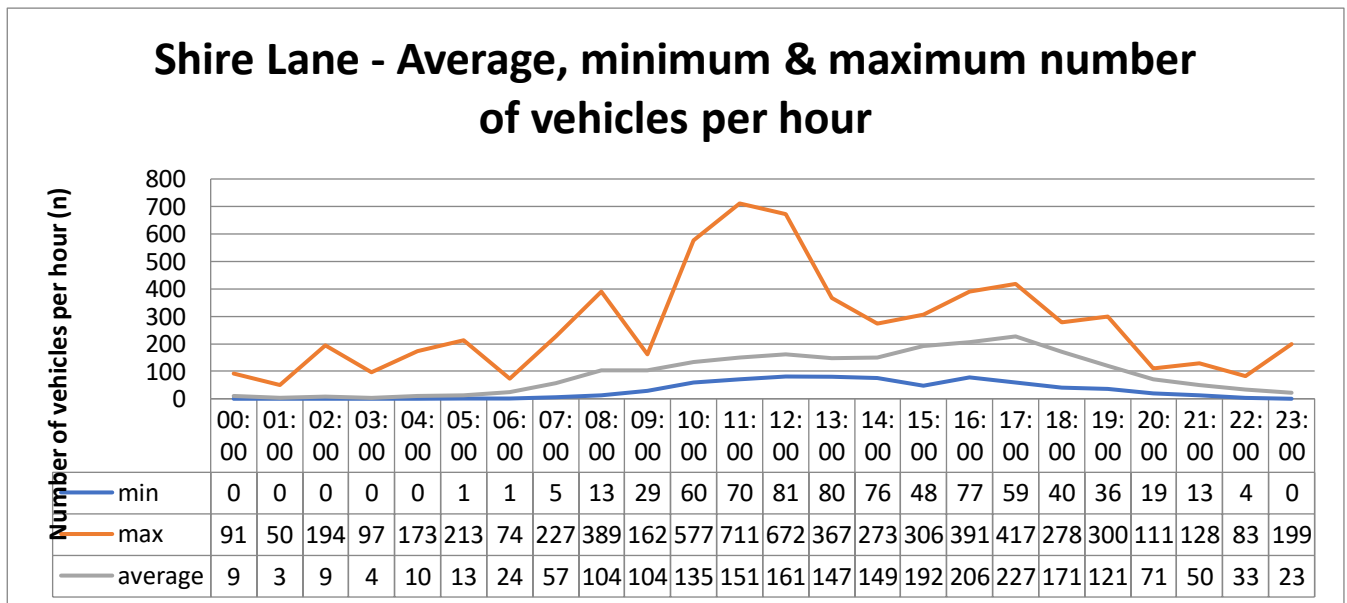


Chart 4 shows average daily traffic numbers entering Claypole from the Newark direction, peaks times and impact of diversions through the village.