

Knightsford Neighbourhood Plan – Dorset Council Comments

Introduction

Thank you for consulting Dorset Council on the Knightsford Neighbourhood Plan (October 2024). This consultation response is primarily from the Community Planning Team with an additional point added by the Transport Planning Team under policy 13 and Emergency Planning Team under Policy 16.

Dorset Council has actively engaged with Knightsford Parish Council throughout the preparation of the Neighbourhood Plan. This engagement has helped to shape the Plan and as such this representation mainly contains commentary on the Plan where Dorset Council considers issues remain but is supportive of approaches where appropriate.

Revised NPPF (December 2024)

The National Planning Policy Framework was revised on 12 December 2024 to reflect the Government's proposed reforms to the Planning system. Paragraph 239 explains that the revised framework will apply for purposes of preparing neighbourhood plans from 12 March 2025 unless the neighbourhood plan has been submitted to the local planning authority under Regulation 15 on or before this date. As this Plan was submitted on 10 October 2024 and updated 18 November 2024 the Plan can be assessed against the December 2023 NPPF. Consequently all references in this response are to the December 2023 version of the NPPF.

Designating the Neighbourhood Plan Area

Knightsford Group Parish Council covers the four parishes of Tincleton, West Knighton, West Stafford & Woodsford and the Plan often refers to each parish’s unique identity, such as at Appendix 3.

Paragraph 1.2.2 explains the Knightsford Neighbourhood area was originally designated on 15 June 2021 however due to changes to the parish boundary at West Knighton in April 2024, the Parish Council requested to have the area redesignated based on the new boundary. The Knightsford Neighbourhood area was re-designated on the 24 July 2024 now including Oakwood but excluding 17a, 19 and 19a West Knighton and land to the west of the A352.

Details can be found on our website at: [Decision - To amend the Knightsford Neighbourhood Area \(comprising of Tincleton, West Knighton, West Stafford and Woodsford\) to reflect changes made to the parish boundary in April 2024 arising from a Community Governance Review. - Dorset Council](#)

How long the Plan will last

The front cover confirms the Plan period is expected to cover the period 2023 – 2033, a ten-year time horizon.

Implementation and monitoring of the plan

It is noted that the need for a review will be considered following the adoption of the new Dorset Council Local Plan. It may also need to be reviewed sooner, if there are significant changes in national policy or legislation, or local issues that arise that need to be covered.

Policy 1 Development set in rural landscapes

Policy 1 sets out requirements for development in rural landscapes. The criterion draws on the Design Code guidance in section DC02.4 Development set in rural landscape. The relevant Local Plan policy is COM7, and section 9 of the NPPF. No concerns are raised.

Policy 2 Wildlife corridors and biodiversity

Policy 2 seeks to strengthen the wildlife corridors in the Neighbourhood area. The policy criteria are formed from guidance in the Design Codes on DC01.3 Improve the green network and promote biodiversity.

The policy is considered to be in general conformity with adopted Local Plan policies ENV2 Wildlife and Habitats and ENV3 Green Infrastructure Network. No concerns are raised.

Knightsford Design Code

The Neighbourhood Plan is supported by an area-wide design guidance and codes document (April 2023) prepared by AECOM. It is noted that the design codes are 103 pages in length and for brevity a description of the four parish areas is summarised in Appendix 3.

The Neighbourhood Plan has translated much of the design code into design policies (Policies 1-9, 12 & 14) however without a specific reference to the Design Code in the Policy text there is a risk that some of the design guidance will not receive development plan weight in decision making. Any information required for decision making or the preparation of a planning application should be within the Neighbourhood Plan document.

Policies 3-9

No concerns are raised with policies 3-9.

Policy	Design Code (2023)	Local Plan (2015)	NPPF (2023)
Policy 3 Plot formation, building set-back, orientation and boundary treatments	DC02.7 and DC03.10	ENV10, ENV11 and ENV12	Chapter 12
Policy 4 Incorporating the car in developments – parking guidelines	DC03.12	ENV10 and COM9	Chapter 12
Policy 5 Density, building heights and rooflines	DC03.9	ENV10, ENV11 and ENV12	Chapter 12
Policy 6 Building mix	DC03.9	ENV10 and ENV12	Chapter 12

Policy 7 Materials and architectural detail	DC03.8	ENV10 and ENV12	Chapter 12
Policy 8 Extensions and conversions – general principals	DC03.11	ENV10, ENV11 and ENV12	Chapter 12
Policy 9 Sustainability in design	DC03.13, DC03.18 and DC01.3	ENV12	Chapter 12

Policy 10 Local Green Spaces

Policy 10 seeks to protect local green spaces from inappropriate development that would harm their character and reason for designation. Four local green spaces are described, mapped, and justified in Table 1.

NPPF (Dec 2023), paragraphs 104 to 107 explain that policies for managing development within a Local Green Space should be consistent with those for Green Belts.

We do not have any concerns with the proposed West Knighton Village Green and Playpark, West Stafford Play Area & The Green, West Stafford as Local Green Spaces. Each site is in reasonably close proximity to the community it serves; demonstrably special to a local community, local in character and are not extensive tracts of land.

Land To East of Wynd Close, West Stafford has a longer planning history and has therefore been considered in more detail. The proposed Local Green Space wraps around the recently built development known as Shepards Walk and has been promoted for further housing development through the Dorset Council 2024 ‘call for sites’, reference: LA/WSTA/001. In addition a planning application P/OUT/2022/00153 for 14 dwellings with associated access, parking and landscaping was submitted in January 2022 but refused on 26 August 2022. A subsequent appeal APP/D1265/W/23/3317274 was dismissed on 15 October 2024.

Planning practice guidance, regarding Local Green Spaces, Paragraph: 008 Reference ID: 37-008-20140306 states “Local Green Space designation will rarely be appropriate where the land has planning permission for development.” Although the site has been promoted for development it does not have planning permission at the current time (January 2025), consequently no objection is raised, subject to the space being demonstrably special to a local community and hold a particular local significance.

Policy 11 Important local views and landmarks

Policy 11 and Table 2 describe 13 locally valued views which are indicated on the maps in Appendix 4. Each of the views has a clear description and often refer to a local landmark or building assisting interpretation.

No concerns are raised.

Policy 12 Development in proximity to heritage assets

Policy 12 seeks to minimise harm to the significance of heritage assets from new development in proximity and where appropriate raise awareness of that asset.

The policy criteria reflect the guidance in section DC02.6 Development in close proximity to heritage assets in the supporting Design Codes. No concerns are raised.

Policy 13 Village roads and Quiet, Low Traffic Routes

Policy 13 considers the safety and comfort of pedestrians from development assessing or extending village roads. Criterion 2 states “Transport statements / assessments, when required, should include consideration of the impact of increased motorised traffic on the network of Quiet, Low Traffic Routes (as shown on Map 4 and including the national cycle network).”

Paragraph 5.2.4 explains the term ‘Quiet Lanes’ has been used in other Neighbourhood Plans to indicate roads which have low levels of traffic and are important for walking / riding routes (in conjunction with the off-road public right of way network). The term is also used in a legal sense where a Highway Authority can designate part of its highway network as a ‘Quiet Lane’ under the Transport Act and related regulations.

The policy team are content the distinction between the status of the rural network as ‘Quiet, Low Traffic Routes’ and the possible future status of the roads as ‘Quiet Lanes’ is clear. The blurred definition of the two terms was an earlier concern at the regulation 14 stage.

Quiet Lanes

Project 2 sets out the Parish Councils intention to request Dorset Council as the Highways Authority to formally designate the network of Quiet, Low Traffic Routes as shown on Map 4 as Quiet Lanes, and manage these accordingly.

The Transport Planning Team responded: Project 2, Table 3 and Map 4 refer to designating a network of Quiet Lanes throughout the Neighbourhood Plan area. The ‘Quiet Lanes’ initiative was popular several years ago but there are no formally designated quiet lanes in the county. Whilst Dorset Council is committed to encouraging more walking and cycling, we don’t have a Quiet Lanes policy and there is some way to go for us to be convinced that doing so would result in a significant change in travel choice or driver behaviours. However, as part of the work to develop a new joint Local Transport Plan for the whole of Dorset we are likely to look again at this policy area so it could feature as part of our future strategy.

Policy 14 Prioritising walking, cycling and horse riding

Policy 14 and Map 4 identifies a reasonably good network of public footpaths and bridleways as well as a part of the national cycle network. Development can help establish a robust network of routes to achieve good levels of connectivity and encourage walking and cycling for short journeys with opportunities for improved routes described in Table 3.

The criterion reflects section DC01.2 Prioritising walking and cycling and access to the countryside in the Design Codes and can be supported. No concerns are raised.

Policy 15 Supporting community facilities

The first two parts of Policy 15 seek to prevent the unnecessary closure of listed community facilities and supports proposals that would allow such facilities to modernise and adapt to future needs and long term viability. This policy is in general conformity with adopted Local Plan policies COM2 and COM3 and can be supported.

The third part of Policy 15 supports new small-scale facilities that can help meet local needs provided they are accessible from built up areas and subject to environmental, road safety and amenity concerns. Dorset Council is supportive of paragraph 6.1.4 which reflects the latest evidence and clarifies “As a guide, the reference in the policy to ‘small-scale’ should therefore be interpreted as below 280m² gross floorspace, as this is considered to be of a scale that would not require any sequential or impact assessment (based on the recommendations of the 2022 update to the Dorset Retail & Leisure Study) and therefore appropriate to a rural area.”

Housing Requirement

Paragraphs 7.1.1 through to 7.1.3 helpfully summarises the adopted West Dorset, Weymouth & Portland Local Plan (2015) spatial strategy and the emerging Dorset Council Local Plan (2021) expectations for the delivery of future housing in the Knightsford area, by its components.

The proposed Neighbourhood Plan housing requirement methodology is set out in the supporting text of policy DEV9 and within Appendix 2 of the emerging Dorset Council Local Plan. In summary, the proposed housing requirement is the sum of completions since the beginning of the Plan period, extant planning permissions, adopted housing allocations, capacity on major sites (of 10 or more dwellings) within development boundaries as evidenced in the SHLAA and a windfall allowance on minor sites (of less than 10 dwellings).

For Knightsford there is no specific housing requirement set out in Appendix 2 of the draft Dorset Council Local Plan as the area designation post-dates the Local Plan however the draft methodology can still be used to derive a figure.

Given the Plan period is anticipated to run from 2023-2033 the table after paragraph 7.1.2 correctly lists 1 completion/commitment and a windfall allowance of 5 dwellings. There are no large sites within the settlement boundary or strategic site allocations. For the avoidance of doubt, the one commitment is the net residual at West Knighton Farm WD/D/19/003063 & WD/D/20/002984 (2 gross).

This figure should be viewed as a minimum requirement and, therefore, can be exceeded however, the scope of a neighbourhood plan is up to a neighbourhood planning body. There is no requirement for neighbourhood plans to allocate sites or identify any additional land to meet the overall Local Plan housing need figure. In instances where neighbourhood plans don’t allocate sites it is unlikely that the plan area would benefit from the additional policy protection provided by paragraph 14 in the National Planning Policy Framework (NPPF).

The Neighbourhood Plan group commissioned additional research into the needs of their community with the conclusions set out in paragraphs 7.1.5-6 as additional background.

Site options and assessment

Paragraph 7.17 explains “the Neighbourhood Plan Steering Group initiated a ‘call for site’ in late 2022 in order to better understand the locations where landowners would be interested in building new homes”. 14 sites were assessed by AECOM to determine suitability with only land north of Yoah Cottage receiving local support and progressing to the regulation 14 consultation document. Objections from Dorset Councils specialist teams (Conservation, Highways and Environmental) has resulted in this draft allocation being deleted. Paragraph 7.1.9 reflects that whilst this Neighbourhood Plan does not include site allocations, there are other opportunities for housing to come forward as established through the Local Plan. Dorset Council has no concerns with this conclusion.

Policy 16 Meeting local housing needs in the Plan area

Policy 16 states that the housing target for Knightsford is 6 dwellings over the plan period which will be met through infill development within the defined development boundary of West Knighton, small-scale affordable housing exception sites, sensitive conversion, replacement or sub-division of existing rural buildings and the provision of rural workers dwellings.

Policy SUS2 i), in the adopted Local Plan, states that “Development in rural areas will be directed to the settlements with defined development boundaries, and will take place at an appropriate scale to the size of the settlement. Settlements with no defined development boundary may also have some growth to meet their local needs.” Policy SUS2 iii) continues that outside defined development boundaries, development will be strictly controlled, having particular regard to the need for the protection of the countryside and environmental constraints, restricted to listed exceptions.

West Knighton is the only settlement with a defined development boundary in the neighbourhood plan area and the remaining criteria listed in Policy 16 reflect the exceptions listed in Policy SUS3 criterion iii) and can be supported.

Affordable Housing

The second part of Policy 16 lists the mix of dwelling types new development should seek to deliver including affordable homes for rent, first and shared-ownership and open market homes, primarily for smaller 1-2 bedrooms.

The need for primarily smaller, one or two bedroom properties reflects the recommendations in the supporting Housing Needs Assessment prepared by AECOM. For example, Table 5-11 shows a greater need for 1 and 2 bedroom properties.

Local connection, tenure blind & secure arrangement

The third part of Policy 16 refers to the need to prioritise allocations on the basis of the local connection criteria in the Dorset Housing Allocation Policy (which should read Dorset Council Housing Allocation Policy). Affordable housing delivered should also be tenure blind and mechanisms should be in place for affordable housing to remain so in perpetuity.

Supporting paragraph 5.2.10 of Local Plan policy HOUS1 explains “Future occupancy will also be prioritised for people with a local connection”.

Policy HOUS1 criterion v) states “The type, size and mix of affordable housing will be expected to address the identified and prioritised housing needs of the area and should be proportionate to the scale and mix of market housing, resulting in a balanced community of housing and / or flats that are ‘tenure blind’.”

Policy HOUS2 criterion i), in the Local Plan, reads “there are secure arrangements to ensure that the benefits of affordable housing will be enjoyed by subsequent as well as initial occupiers.”

The third part of Policy 16 is therefore considered to be in general conformity with Local Plan Policies HOUS1 and HOUS2.

ONR consultation zone

Thank you for contacting Emergency Planning. As per the mentioned guidance “*Under the Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019, local authorities are responsible for setting Detailed Emergency Planning Zones (DEPZ) for nuclear sites where there could be a radiation emergency with off-site consequences and preparing detailed plans for responding to such an emergency, within the DEPZ area. The off-site plans are put in place to minimise and mitigate the health consequences of any significant radiological release that might occur as a result of radiation emergencies at nuclear sites.*”

The only REPPiR site within the boundaries of Dorset Council, for which the Local Authority has to set a DEPZ and prepare an off-site plan, is the [MoD Operational Berth at Portland Port](#).

We can confirm that the Knightsford Neighbourhood Plan does not have any impact upon, or pose an external hazard to this site.

Strategic Environmental Assessment (SEA)

A SEA Screening Opinion carried out in February 2023 concluded that “whilst the development may be small scale, there is a potential for significant adverse impacts to the environment, in the absence of assessment and clarity on mitigation. In order to fully assess the potential impacts of the proposals, a full Strategic Environmental Assessment is required.”

In response, a full Environmental Report (November 2024) prepared by AECOM has been submitted alongside the submission version of the Knightsford Neighbourhood Plan (KNP).

The Environmental Report has concluded that “Overall, no significant negative effects are considered likely in the implementation of the KNP. The spatial strategy supports infill development and small-scale affordable housing exception sites, as well as conversion, replacement or subdivision of existing rural buildings; this level of growth will support resident needs without impacting upon the rural nature of the neighbourhood area. Minor positive effects are therefore considered likely with regards to community wellbeing.”

The report continues “Broadly neutral to minor positive effects are predicted in relation to the rest of the SEA objectives. This reflects the wider policy provisions which embed landscape and

design considerations, protect and enhance green infrastructure, protect key views and local landmarks, and improve pedestrian safety.”

Habitats Regulation Assessment (HRA)

A Screening Report regarding the Habitats Regulations was prepared in February 2023 and concluded that given the report’s findings in relation to the internationally important wildlife sites, it follows that an Appropriate Assessment under the Habitats Regulations is likely to be required. Dorset Council agreed with this conclusion at that time.

The Neighbourhood Planning group responded by commissioning AECOM to prepare a Habitats Regulation Assessment (February 2024) which has been submitted alongside this Plan.

This HRA undertook a Test of Likely Significant Effects (ToLSEs) screening of the Knightsford Neighbourhood Plan March 2023 Pre-Submission (Regulation 14) version. All NP policies were assessed in relation to the following Habitat sites:

- Dorset Heathlands SPA/Ramsar
- Dorset Heaths SAC
- Isle of Portland to Studland Cliffs SAC

Following ToLSEs screening, it was concluded that one policy, Policy 17 Land north of Yoah Cottage, had the potential to cause a likely significant effect to designated sites and was discussed with regards to recreational pressures, air quality and water pollution.

It has been concluded that the Knightsford Neighbourhood Plan will not affect the integrity of European sites in relation to recreational pressure due to the overarching provisions in the West Dorset, Weymouth and Portland Adopted Local Plan (2015) and the Local Plan Review (Preferred Options Stage, 2018)¹ with which all new housing in the Neighbourhood Plan will need to comply. It is recommended that a policy is included within the Neighbourhood Plan which supports the Local Plan policies for the protection of European sites such as *“Any development brought forward must ensure that it can be implemented without any adverse effect upon the integrity of the European sites. Proposals that will adversely affect the integrity of European sites will not be supported.”*

As highlighted by the nutrient budget and the legal framework set by the overarching adopted Local Plan, mitigation for water quality impacts on Poole Harbour SPA will be required to allow the six dwellings allocated in the Knightsford Neighbourhood Plan to come forward. A broad range of measures are available to mitigate potential adverse effects of nutrients in treated sewage effluent, both within development sites and off-site. The details of mitigation will need to be identified for each application. However, it is recommended that the Neighbourhood Plan includes text flagging the nutrient neutrality requirement that exists for the Poole Harbour SPA.

¹ Reference to Local Plan Review (2018) should have been updated to read Dorset Council Local Plan – Options Consultation (2021)

Finally, with regard to air quality, the Adopted Local Plan was concluded not to cause a significant adverse effect upon the integrity of European sites for the planned 15,880 dwellings within West Dorset. As the 3 dwellings allocated in Knightsford, are a very small fraction of 15,880 allocated for West Dorset as a whole, it can be concluded that the potential increase in road use through an increase in housing will not contribute to a significant adverse effect on the integrity of nearby European sites in combination with other plans and projects.

As the final version of the neighbourhood plan has been updated with the suggested wording (Policy 16 and paragraph 7.1.10 has been updated to refer to the Poole Harbour SPA) it can be concluded that the Plan document will not result in an adverse effect on the integrity of any European sites either alone or in combination.