

**Mr. Vernon Knapper**  
**RESPONDENT ID No. 3076**  
**ISSUE NO. 1**

**NORTH DORSET LOCAL PLAN**

**EXAMINATION IN PUBLIC**  
**ISSUE 1**

**STATEMENT ON BEHALF OF**  
**Mr. VERNON KNAPPER**

**BY**  
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This statement is made on behalf of Mr. Vernon Knapper in respect of Issue 1 identified by inspector Mr. Hodder.

### **Q 1.1-1.2 Duty to co-operate.**

- 1.1.1 The inspector will be aware that in adopting the Purbeck Local Plan the planning authority was not planning to meet the Full objectively assessed housing needs (FOAN) of the district. The inspector accepted that 170 dwellings per annum was an appropriate assessment but also accepted that there was doubt as to whether this could be achieved having regard to environmental constraints. The Plan was adopted with a target of just 120 dwellings per annum but subject to an early review. That review is only just commencing. There was mention of a possible significant development at Crossways. What Mr. Hodder may not be aware of is that in its Local Plan, far from accommodating the shortfall from Purbeck District, West Dorset District Council has submitted a plan with less housing at Crossways than was envisioned at the time of the Purbeck EiP.
- 1.1.2 Poole Borough Council adopted its Local Plan in February 2009. Since that time the borough has failed to deliver the required level of housing in any year. A problem has been encountered with one of the major regeneration sites in Poole. A review of that local plan has recently commenced. In view of the shortfall the review plan will probably have to show an increased annual housing land requirement. It may be that some of that requirement will have to be found outside Poole. That may require a review of Green Belt boundaries with implications for all of the adjoining districts in the Housing Market Area including North Dorset. It may also require consideration of housing land provision beyond the Green Belt, particularly in the A350 corridor.
- 1.1.3 In addition to Blandford there are a number of larger villages along the A350 where such development could be accommodated.

### **Q1.4 The Strategy and Sustainability Appraisal**

- 1.4.1 In 2007 the planning authority carried out a substantial exercise Assessing settlements based on population and community facilities. Clearly this was an objective assessment to identify the most (potentially) sustainable settlements as a basis for sustainable settlement strategy. It is not clear to me why this process was abandoned other than as a result of a "nimby" response to draft settlement strategies.
- 1.4.2 The Local Plan Strategy is incompatible with the Core Planning Principles in the NPPF, part 3-Supporting a Prosperous Rural Economy and paragraphs

50 and 55. It ignores the guidance in the National Planning Practice Guidance:-

*"It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements.*

*A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.*

*all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence."*

- 1.4.3 The planning authority appears to have abandoned a sustainability appraisal that would have been compatible with the guidance.

### **Q1.7 Justification for only 230 dwellings in smaller settlements and Significant Opportunities**

- 1.7.1 There is no justification for applying countryside policies to all settlements except the 4 main towns. There are 57 settlements in North Dorset. This policy represents an average of 4 dwellings per settlement over the whole of the plan period! In 2007 there were 7207 households in the 20 largest "small" settlements. This policy represents just 3.2% increase over the whole of the plan period.
- 1.7.2 There is no justification for ignoring the results of the objective study in 2007 or the 2010 SHLAA. The whole point of SHLAA is not to identify sites for development but to assess the potential capacity in meeting the FOAN of the HMA. Sites identified in the 2010 SHLAA were assessed as having potential, subject to planning permission. Sites which failed the sustainability criteria were ruled out.
- 1.7.3 The fact that sites were identified in all 19 settlements shows there was and remains a clear "opportunity" for sustainable residential and economic development.
- 1.7.4 There is a significant opportunity for a mixed use development in Charlton Marshall on land identified on the enclosed extract from the 2012 SHLAA.(VK1). Although outside the previous settlement boundary, The respondent owns land which is effectively surrounded by development. It adjoins residential development to the south. Opposite the site part of the

frontage is occupied by residential development. There are houses to the east . To the North is Newlands Manor, a residential property and north of that is a car dealership/garage and an MOT station.

1.7.5 The SHLAA shows a capacity of 55 dwellings. It extends to approximately 2.5 hectares. Several illustrative layouts have been produced over recent years. In 1996 the Highway Authority confirmed that access from the A350 was acceptable in principle. That has recently been confirmed. All utility services are available. The site is not at risk of flooding. The site could accommodate a convenience store and open space.

**Q 1.8 Would removal of Settlement boundaries lead to uncertainty and an impediment to Sustainable development.**

1.8.1 If countryside policies were to apply to all settlements it may provide some certainty, but a negative certainty treating all villages like Green Belt.

1.8.2 It would definitely act as an impediment to all development including sustainable development. The problem is that North Dorset District Council like its neighbours takes a narrow view as to what sustainability means. The Government's view is that "The policies in paragraphs 18 to 219, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system". These include:-

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Supporting a prosperous rural economy
- Promoting sustainable transport-this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.
- Supporting high quality communications infrastructure
- Delivering a wide choice of high quality homes
- Requiring good design
- Promoting healthy communities
- Protecting Green Belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment
- Facilitating the sustainable use of minerals

1.8.3 Promoting Sustainable transport is clearly only one element out of many when it comes to identifying sustainable development particularly in rural areas. The council's blanket approach fails to have regard to the Governments advice at paragraph 17 to:-

"take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it".

1.8.4 It also ignores the nppg set out at 1.4.2 above.

### **Q 1.9 Opting in to LP Part 2 and reliance on Neighbourhood Plans**

1.9.1 The Local Plan part 1 establishes the Core Principles a rigid spatial strategy and firm targets. It leaves no scope for making sustainable development allocations in other documents which have to conform to the core strategy. It is a charter for Nimbyism.

### **Q 1.10 An Appropriate way forward**

1.10.1 The appropriate way forward is to revert to the previous strategy, to identify those settlements capable of accommodating development in a sustainable manner. They should seek to encourage the viable use of local facilities and to create the opportunity to provide or replace lost facilities fostering the development of communities.

1.10.2 The local planning authority previously established a number of criteria which identified those settlements with the greatest potential to be viable communities. These criteria included population size which is often key to establish the threshold for maintaining viable facilities. The other criteria included an assessment of facilities currently available to residents. The larger settlements often equated to those with viable facilities. Settlements just below the thresholds had potential to establish new or re-establish lost facilities.

1.10.3 In the light of the nppg it would be appropriate to set guidelines for different scales of new development according to the ranking of the settlement. For the larger settlements more housing and economic development should be encouraged. For smaller settlements a lesser provision of housing and economic development should be encouraged but not necessarily limited to local needs. The NPPF recognises for example that allowing some market housing might facilitate the provision of significant additional affordable housing to meet local needs.

### **Q 1.11 Hooks on which to hang Neighbourhood Plans.**

1.11.1 The strategic policies of the local plan provide a reasonable framework for Neighbourhood Plans in the four main towns but for small settlements there would be no scope to make proposals other than for local needs as an exception. There is no incentive to prepare a neighbourhood plan. My own village decided it does not need a neighbourhood plan because the existing planning policies effectively prevent any development that the parish does not want.

## **Q 1.12 Justification for short plan period.**

1.12.1 No doubt the planning authority will say that the existing local plan is out of date and that they need new policy now to “control” rather than “manage” development. That is a situation which has come about because the authority was slow to review its previous local plan and has changed its strategy. That should not justify a shorter plan period. The authority is deferring decisions that it does not want to make. However failure to adopt a longer plan period makes it difficult to plan the infrastructure that will be needed to support development in the long term.

## **PROPOSED CHANGES TO THE LOCAL PLAN**

3.46 Outside the defined boundaries of the four main towns....Delete this paragraph as inconsistent with the NPPF and nppg. Substitute a paragraph which seeks to support sustainable development within identified settlements including amongst others Charlton Marshall and Pimperne. Add criteria for the promotion of sustainable development appropriate to the scale of settlements in order to enhance the communities.

3.49 Where a local community wishes to see growth to meet local needs, but those needs cannot be met through countryside policies alone, they have the option of preparing a neighbourhood plan.... Delete Substitute “Local communities have the option of preparing a neighbourhood plan where the local plans makes proposals for additional housing and economic development and/or they wish to make provision for housing to meet local needs.”

3.56 The settlement boundaries defined around all other settlements in the North Dorset District-wide Local Plan 2003 have been removed. These settlements are subject to countryside policies, although a local community would be able to establish a new settlement boundary (within which infill development could take place) either in a neighbourhood plan, or, if they have ‘opted in’, in the North Dorset Local Plan Part 2. Delete the whole of this paragraph. Identify settlement boundaries for all larger settlements including villages leaving scope to provide housing and economic development to enhance the sustainability of these settlements.

Figure 3.1 - Key diagram for North Dorset Identify a hierarchy of settlements to which new settlement policies will apply.

**POLICY 2: CORE SPATIAL STRATEGY** Delete those parts of the policy under the following headings:-

**The Countryside (including Stalbridge and the Villages)  
Settlement Boundaries**

Substitute new paragraphs setting out a hierarchy of settlements and the policies to be applied to each level in the hierarchy.

Figure 5.1 – Proposed Spatial Distribution of Housing Development **Re work the whole table increasing the housing land requirement to reflect the Full Objective Assessment of the need for market and affordable housing and making greater provision for housing in smaller settlements in accordance with a hierarchy taking into account SHLAA.**

5.24 Concentrating the vast majority of strategic housing growth at the four main towns....**Delete this and the following paragraph Substitute a policy taking a positive approach to promoting a strong rural economy in accordance with the NPPF and nppg.**

**POLICY 6: HOUSING DISTRIBUTION** **Delete the last paragraph and insert a realistic level of housing to meet the FOAN for market and affordable housing.**

## **APPENDIX**

VK 1 Extracts from the North Dorset SHLAA and map 2012