**TOWN AND COUNTRY PLANNING ACT 1990** 

PLANNING AND COMPULSORY PURCHASE ACT 2004

**SECTION 78 APPEAL** 

BY DUDSBURY HOMES (SOUTHERN) LTD

REGARDING: MIXED USE DEVELOPMENT OF UP TO 1,700 DWELLINGS INCLUDING
AFFORDABLE HOUSING AND CARE PROVISION; 10,000 SQM OF EMPLOYMENT SPACE IN
THE FORM OF A BUSINESS PARK; VILLAGE CENTRE WITH ASSOCIATED RETAIL,
COMMERCIAL, COMMUNITY AND HEALTH FACILITIES; OPEN SPACE INCLUDING THE
PROVISION OF SUITABLE ALTERNATIVE NATURAL GREEN SPACE (SANG); BIODIVERSITY
ENHANCEMENTS; SOLAR ARRAY, AND NEW ROADS, ACCESS ARRANGEMENTS AND
ASSOCIATED INFRASTRUCTURE (OUTLINE APPLICATION WITH ALL MATTERS RESERVED
APART FROM ACCESS OFF HILLBURY ROAD)

AT: LAND TO THE SOUTH OF RINGWOOD ROAD, ALDERHOLT

**PROOF OF EVIDENCE** 

Of

JO WITHERDEN BSc(Hons) DipTP DipUD MRTPI

ON BEHALF OF

ALDERHOLT PARISH COUNCIL

May 2024

PLANNING INSPECTORATE REFERENCE: APP/D1265/W/23/3336518

LOCAL PLANNING AUTHORITY REFERENCE: P/OUT/2023/01166

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#### **EXECUTIVE SUMMARY**

- My name is (Ms) Jo Witherden and I am a chartered town planner and a full member of the Royal Town Planning Institute. The following provides a summary of the key points arising from my evidence.
- 2. My proof of evidence deals primarily with the two main issues identified by the Inspector and the planning balance. It sits alongside the evidence prepared by Alderholt Parish Cllr Gina Logan and Mark Baker who is the Parish Council's Highways / Transport Witness, and has sought to minimise any unnecessary duplication of Dorset Council's case.

#### ISSUE 1: THE SIGNIFICANCE OF THE PROPOSAL IN MEETING HOUSING NEED

- 3. Whilst there is no dispute that the housing need across the former East Dorset area is significant, including care home and affordable housing need, there are a number of additional factors that my proof of evidence addresses that should be considered in determining the weight to attribute to the proposed development in addressing this shortfall. In addition to giving weight to the magnitude of the shortfall<sup>1</sup>, it is also appropriate to consider:
  - the extent to which the development will address the need, and what is being done
    elsewhere to address the unmet need (and to this end Dorset Council have produced an
    action plan). I draw the Inspector's attention to the outline nature and complexities of
    the scheme including minerals extraction which in my opinion are likely to add
    considerable delay to the scheme's delivery;
  - whether the proposed development is responding to local needs and circumstances.
     The evidence collected in relation to the Neighbourhood Plan does not suggest that there is any significant local housing need that will not be met through the
     Neighbourhood Plan proposals.
- 4. The evidence on these additional points does, in my opinion, moderate the weight to be applied to the benefit arising from the provision of housing.

<sup>&</sup>lt;sup>1</sup> and the Parish Council defers to Dorset Council's expertise on the housing numbers

#### ISSUE 2: WHETHER THE DEVELOPMENT WOULD BE APPROPRIATE IN THIS LOCATION

- 5. The Inspector has brought a number of related matters under this issue to help consider whether the development would be appropriate in this location. Turning briefly to each of the main points:
- 6. Firstly, the development clearly conflicts with the spatial strategy my evidence demonstrates that it is of a significant scale wholly out of proportion to the size of the village and its place in the hierarchy. It was not the intention of the spatial strategy to fail to plan for new neighbourhoods, or to increase the size and facilities of rural settlements to that of the higher tier towns and urban areas. It also means that this scale of development, which would have been a strategic allocation had it been considered necessary, has not benefitted from the forward planning that was undertaken for the new neighbourhoods proposed at the higher tier settlements. This is very clear from what could, at best, be described as an evolving application and appeal. The spatial strategy is broadly consistent with the NPPF, is not overly restrictive (taking into account how it was applied by Dorset Council and the Planning Inspector in the 2017 appeal decision on The Hawthorns site on Ringwood Road) and still of relevance in achieving sustainable development.
- 7. The scale of this development will have a notable impact on the character of the village and its surrounds, which in my opinion will be harmful; with the built-up area increasing by approximately 60%, areas of comparably high density development, a change to the character of Ringwood and Hillbury Roads and their relationship with the countryside (as experienced by users of those roads), more traffic on the wider rural roads network, more activity in the remaining countryside immediately adjoining the village, and a shift in the functional centre of the village away from its historic focus along the B3078 Daggons Road / Station Road, which is and always has been the historic focus of these activities;
- 8. The contention that this scale of development will notably improve the employment prospects for the village and the provision of local facilities is not borne out by the evidence. Not only is there significant uncertainty over their delivery (linked to the poor forward planning for this proposal), but the benefits are limited the main one being a new health centre. The lack of clarity on the education provision regarding the First School and pre-school provision, is a further concern.

- 9. With regard to travel patterns and associated impacts, I have deferred to Mark Baker's expertise on this matter. In summary, he has concluded that the development is likely to lead to considerable levels of out of village movements for access to a wide range of services and facilities. It fails to offer a genuine choice of transport modes, and the public transport benefits (including the proposed dedicated bus service) are highly unlikely to make any notable difference to the traffic levels.
- 10. Finally, I turn to the issue of the emerging Neighbourhood Plan. My evidence demonstrates that the scale and location of the development clearly conflict with key policies in the Plan. It also includes information to assist the Inspector in deciding the weight to be given to the policies, bearing in mind the three tests included in paragraph 83 of the NPPF, which relate to the stage the plan has reached, the extent of unresolved objections, and the degree of consistency between the plan and the NPPF. In my opinion there is evidence to suggest that at least some of the policies should be given more than limited weight, particularly policies 1, 6, 10, 16 and 17, and the conflicts identified with these, which primarily deal with matters impacting on local character. Turning to the matter of prematurity, the decision to approve this development now would, in my opinion, be so substantial that to grant permission would undermine the plan-making process by predetermining decisions.

#### THE PLANNING BALANCE

- with the development plan (read as a whole). The scale and location of the development are, in my opinion, clearly contrary to the settlement hierarchy and associated policies that together direct development to the most sustainable locations (Policies KS2, KS4 and KS9). I also make reference to the harm to the character of the village and its landscape, the unacceptable impacts on highways, and adverse impacts on the European wildlife sites that provide further policy conflicts at this stage.
- 12. Having established that there is a clear conflict with the development plan, I then turn to the planning balance. I comment briefly on each matter in turn and the weight that I would suggest is given to these. I have applied the tilted balance on the assumption that the adverse impacts on the European wildlife sites can and will be resolved. If this issue has not been

resolved, I note that this then this becomes a decisive matter on which the application should be refused.

- 13. Matters that I consider are demonstrated to weigh in favour of the scheme are:
  - HOUSING including affordable housing and care provision to which I would attribute
     significant weight collectively, given my findings from the first issue;
  - BIODIVERSITY NET GAIN including SANG / Green Infrastructure to which I would attribute significant weight collectively, deferring to Dorset Council's expertise;
  - LOCAL EMPLOYMENT / ECONOMIC BENEFITS to which I would attribute moderate
    weight, as my evidence shows that the employment provision will not be sufficient for the
    increase in workforce (therefore representing a net loss), and its delivery is far from
    certain;
  - PUBLIC TRANSPORT BENEFITS to which I would attribute limited weight, as, based on the route and timetable suggested by the Appellant at this time, it would not provide sufficient choice to adequately serve the local residents, including households that do not have access to a car, because of the limited destinations covered; the limited evening and weekend service. There is also no certainty that the service will be viable in the long term;
  - PUBLIC OPEN SPACE to which I would attribute limited weight. Whilst 19.1ha of green
    / blue infrastructure should be provided in addition to the SANGs, this replaces existing
    countryside (which is valued by local residents), and is primarily intended to mitigate the
    adverse impacts of the increased population on the existing provision (which already
    serves the village well).
  - ENERGY STRATEGY / SOLAR ARRAY to which I would attribute limited weight collectively, deferring to Dorset Council's expertise on this issue.
- 14. Matters that I consider are demonstrated to weigh against the scheme are:
  - SPATIAL STRATEGY / SUSTAINABILITY OF LOCATION to which I would attribute very significant weight, given my findings from the second issue;
  - IMPACTS ON HIGHWAY NETWORK to which I would attribute significant weight,
    given Mark Baker's conclusions regarding the under-estimation of the highways impacts
    and consequent concerns that these cannot be effectively mitigated. It is also clear that a
    large proportion of trips arising from the development will be external, car-based and

- medium to long distance. As a result, until such time that all vehicles are genuinely zerocarbon, the vehicular traffic arising from the development will have an adverse impact on climate change, which would not be the case if directed to a more sustainable location
- PREMATURITY IN RELATION TO THE ALDERHOLT NEIGHBOURHOOD PLAN to which
   I would attribute significant weight, given my findings from the second issue
- IMPACTS ON LOCAL CHARACTER (including landscape character) to which I would attribute moderate weight, given my findings from the second issue
- IMPACTS ON THE NATIONAL LANDSCAPE to which I would attribute moderate
   weight, deferring to Dorset Council's expertise;
- LOSS OF BEST AND MOST VERSATILE AGRICULTURAL LAND to which I would attribute at least moderate weight. This issue does not appear to have been covered in the planning application or considered in Dorset Council's Statement of Case, but given that there is a reasonable prospect that as much as 40ha of productive farmland of Grade 3 or higher, which may fall within this category, could be lost, this could reasonably be deemed to be a significant material harm both in terms of its contribution to food production and as a carbon sink.
- PROVISION OF A NEW LOCAL CENTRE, SERVICES AND FACILITIES including healthcare and education to which I would attribute limited weight. I find myself in the unusual position of collectively attributing harm to the provision of these types of facilities, but this is based on my findings from the second issue. The potential benefits of improved access to local healthcare are, in my opinion, negated by the issues relating to education. There is also a policy conflict in relation to Policy 8 in the emerging Neighbourhood Plan, which aims to reinforce the sense of a village centre/high street in this location. Whilst at this stage I only give this policy limited to moderate weight, I consider that it does tip my conclusions on this issue into one of attributing overall harm, albeit limited.
- 15. With regard to the impacts on the European Habitats, should evidence be forthcoming that the adverse effects on the site's integrity can be satisfactorily mitigated, then there may be a limited degree of harm or some benefit not already accounted for that should go into the planning balance.

- 16. With regard to flood risk, whilst I am aware of concerns that have been raised by parishioners, it is accepted that Dorset Council are satisfied that the risk can be mitigated subject to conditions, and the Parish Council defers to their expertise on this matter. I am not aware of any evidence demonstrating that the proposals would improve flood safety elsewhere. I have therefore considered this as having negligible influence on the planning balance.
- 17. I briefly touch on other matters raised by either Dorset Council or the Appellant in their respective statements, but do not consider that these would make a material difference to this conclusion.
- 18. Finally, I state that it is my professional opinion that, notwithstanding the benefits that would accrue from the proposal, and applying the tilted balance, the adverse impacts of the scheme would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole. The proposal would not therefore be sustainable development. Respectfully, the Inspector is asked to dismiss this appeal.

#### 1. EXPERIENCE AND QUALIFICATIONS

- My name is (Ms) Jo Witherden and I am a chartered town planner and a full member of the Royal Town Planning Institute.
- I have an upper second-class honours degree in City & Regional Planning from Cardiff University and was awarded a distinction in the Diploma in Town Planning from Cardiff University. I also have a distinction in the Diploma in Urban Design from Oxford Brookes University.
- 1.3 Following a brief period in private practice, I have worked in planning policy roles in local authorities across Dorset for nearly 20 years. I was last employed as Head of Spatial Policy and Implementation for Weymouth & Portland Borough Council and West Dorset District Councils, leading a multi-disciplinary team of more than 10 officers dealing with planning policy, environmental assessment, planning obligations, urban and landscape design for the two council areas.
- In late 2014 I began working as an independent planning consultant, and in early 2016 I established my own company, Dorset Planning Consultant Limited. During this time my work has included acting as an agent for clients submitting planning applications and appeals, drafting objections to planning applications and representing them at appeal, acting as a Planning Witness at several Inquiries, commenting on emerging development plans, and working with over thirty Town and Parish Councils to successfully take their Neighbourhood Plans through consultation and examination. I have worked for Alderholt Parish Council during this period providing planning advice on the emerging Local Plan and supporting the preparation of their Neighbourhood Plan.
- The evidence which I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the RTPI and Ikarian Reefer principles, and I confirm that the opinions expressed are my true and professional opinions, and that my duty as a professional planner is to the Inquiry.

#### 2. INTRODUCTION

#### The Parish Council

Alderholt Parish Council ('the Parish Council' or 'APC') has been granted Rule 6 status in this Inquiry, and has appointed myself (Jo Witherden BSc(Hons) DipTP DipUD MRTPI) as its Planning Witness, and Mark Baker BSc CEng MICE FCIT FILT Eurlng as its Highways / Transport Witness. The role of the Parish Council is set out in the Parish Council's Statement of Case and further described in the witness statement of the Parish Council Neighbourhood Planning Committee and Chairman of the Planning Committee, Cllr Gina Logan.

# The Sites and its Surroundings

- The background to the appeal and a brief description of the site and surroundings is set out in the Parish Council's Statement of Case.
- 2.3 There is no relevant planning history pertaining to the site itself (either than the EIA scoping opinions provided by Dorset Council), but recent, relevant decisions regarding development around Alderholt are briefly covered in this proof of evidence. I have considered the findings of the previous Inspector in relation to the site north of Ringwood Road (Appeal Ref: APP/U1240/W/17/3169111²), although note the difference in scale, relationship with the countryside and that the decision dates back to November 2017.

#### Main Issues for the Inquiry

- The Inspector's Post-Conference Note following the Case Management Conference in May 2024 identifies two main issues to be dealt with in the evidence, which in summary are:
  - 1) The significance of the proposal in meeting housing need, having regard to the current supply of housing land and the age of the local plan. This includes:
    - The housing land supply position
    - The community's need for housing

<sup>&</sup>lt;sup>2</sup> https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3169111&CoID=0

- The quantity of affordable housing to be provided (based on viability)
- 2) Whether the development would be appropriate in this location having regard to: its relationship to Alderholt and other settlements and their facilities (and in this respect I have included the character of the site and its surroundings); its connection to the highways network; the local plan spatial strategy; and the emerging Neighbourhood Plan.
- 2.5 Matters that will be considered but are intended to be dealt with through topic papers are:
  - Highways = whether the potential highways impact of the scheme would be suitably mitigated by off-site highways works and sustainable transport measures.
  - Ecology = whether the potential ecological impact of the scheme on protected habitats would be adequately mitigated.
  - Local centre location = whether the proposed local centre would be suitably located and adequate to serve the development (whilst recognising that this is an outline scheme), and whether its impact on other centres would be acceptable.
  - Education = whether the scheme would make appropriate provision for education.
- 2.6 My proof deals primarily with the two main issues and planning balance. The Parish Council anticipates engaging on the SoCG and topic papers in relation to housing supply; the planning policy context; mitigation of highway impacts/local highway works; the content and location of the local centre and any retail impact; and the intended approach to education although this may simply be to check that we have nothing further to contribute. We also note the Inspector's suggestion at the CMC that a Neighbourhood Plan Topic Paper may be useful, and the Parish Council has instructed me to prepare this.

## Development Plan context

2.7 The adopted development plans relevant to this appeal are the 'saved' policies in the East Dorset Local Plan of January 2002 ('the EDLP'), the Christchurch and East Dorset Local Plan Part 1 – Core Strategy of April 2014 ('the CEDLP'), the Minerals and Waste Plans (the Bournemouth, Christchurch, Poole and Dorset Waste Plan of December 2019 ('the BCPDWP') and the Bournemouth, Dorset and Poole Minerals Strategy of May 2014 ('the BDPMS').

- The draft Statement of Common Ground available at the time of the CMC identified a list of relevant development plan policies, and a further three policies have been identified in APC's SoC. In reading the CEDLP, the Vision and Strategic Objectives 1, 2, 3, 4, 5, 6 and 7 are also relevant.
- It is agreed between all parties that the Draft Dorset Council Local Plan (DDCLP) Options
  Consultation (Regulation 18) should be afforded very limited weight, given the stage it has reached. This has been compounded by the decision to move across to the new planmaking system and to formally start preparing a new-style local plan. Whilst the appeal site was submitted to the Council's "Call for Sites" process, and features as part of a much wider option area in the DDCLP, it was not identified as a preferred option in that Plan.
- The submission (Regulation 15) draft of the Alderholt Neighbourhood Plan ('ANP') was considered at the Parish Council meeting on 8 April 2024 and submitted to Dorset Council for examination on 29 April 2024. Whilst options for development on the Appeal site were considered (having been confirmed as available in response to the Parish Council's checks), no part of the site has been included as an allocation in the ANP. A small area (part of the proposed SANG) is proposed to be designated as a Local Green Space. The Regulation 16 consultation commenced on 15 May this year, and should conclude on 25 June 2024 at the start of the Inquiry. NPPF paragraphs 48 50 deal with the weight to be attributed to an emerging plan and refusal on the grounds of prematurity under these circumstances, and I cover this further in my evidence.
- The following table sets out the most relevant Local Plan and Neighbourhood Plan policies that I have identified as relating to the main issues for this Inquiry, and the additional topics / matters that have been suggested to be addressed as issues.

Main Issue	LP Policies	NP policies	Brief description
Housing needs	CEDLP KS4,	ANP 7 & 11	Housing provision – housing target,
and supply	LN1, 3 & 6	LN1, 3 & 6 distribution and percentage of	
	and EDLP A1		housing, and the size and type of new
			dwellings
The Spatial	CEDLP KS2,	ANP 7 & 11	Settlement hierarchy and defining Alderholt
strategy, the	KS4, LN4 and		through the use of a "village envelope" , and
character of the	A1		

Main Issue	LP Policies	NP policies	Brief description			
site and its			the role of exception sites in adjoining			
surroundings,			settlements such as Alderholt.			
the relationship	CEDLP HE <sub>2</sub> &	ANP1, 6, 17	Criteria for ensuring developments respect or			
to Alderholt and	3 and LN2,		enhance their surroundings, including local			
other	EDLP DES11		landscape character			
settlements and	CEDLP LN <sub>7</sub>	ANP 8	Local community facilities and services,			
their facilities,	and PC5	(ANP 16 is	including shops, and where these should be			
and the		relevant re:	located in rural areas.			
connection to		the First	The school playing fields are proposed for			
the highways		School)	designation as a Local Green Space.			
network	CEDLP PC1	ANP 8 & 10	Provision of employment land – the			
	and PC4		employment land hierarchy, and the approach			
			to supporting sustainable economic growth in			
			the rural area			
	CEDLP KS <sub>9</sub> &	ANP 9	Transport strategy and development –			
	11		including locational criteria for new			
			development and expected improvements.			
			The ANP supports the creation of a			
			recreational trailway to Fordingbridge using			
			the dismantled railway corridor east of the			
			village.			
Planning	CEDLP KS1		Presumption in favour of sustainable			
balance			development, echoing the presumption in			
			national planning policy			
Additional topics / matters						
Highway safety	CEDLP KS9 &		Transport strategy and development –			
	11		including locational criteria for new			
			development and expected improvements,			
Ecology	CEDLP ME1	ANP 7	Safeguarding biodiversity including the			
	& 2		protection of the Dorset Heathlands			
Masterplan /	CEDLP HE2, 3	ANP 1, 2, 4,	Design of new development, landscape quality			
Urban Design	& 4 and LN2	6 & 16	and the design, layout and density of new			
			development			
			Open space provision including standards and			
			green infrastructure connectivity and Local			
			Green Spaces			

Main Issue	LP Policies	NP policies	Brief description		
Energy Strategy	Strategy CEDLP ME <sub>3</sub> , ANP <sub>5</sub>		Sustainable development standards for new		
	4 & 5		development and renewable energy		
Surface Water	CEDLP ME6	ANP 6	Flood management, mitigation and defence,		
Management /	& 7		including the protection of groundwater		
Drainage					

- 2.12 With reference to the Local Plan objectives, all 7 objectives are relevant to this appeal, as these are (in summary):
  - Objective 1 to manage and safeguard the natural environment, this includes
     protecting and enhancing the Cranborne Chase National Landscape
  - Objective 2 to maintain and improve the character of the towns and villages, and to create vibrant local centres.
  - Objective 3 to adapt to the challenges of climate change this includes having more sustainable patterns of development in accessible locations, and incorporating carbon reduction, water and energy efficiency measures in new developments.
  - Objective 4 to enable the mixed economy of to grow, and to develop new employment sectors.
  - Objective 5 to deliver a suitable, affordable and sustainable range of housing to provide for local needs.
  - Objective 6 to reduce the need for our communities to travel, and to do so more easily by a range of travel choices.
  - Objective 7 to help our communities to thrive and to help people support each other - the main town centres will be the focus for commercial, retail and community facilities, with district centres and villages playing a supporting role.

- 3. ISSUE 1: THE SIGNIFICANCE OF THE PROPOSAL IN MEETING HOUSING NEED, HAVING REGARD TO THE CURRENT SUPPLY OF HOUSING LAND AND THE AGE OF THE LOCAL PLAN
- The Parish Council defers to Dorset Council's expertise on matters of viability related to the level of affordable housing provision, and the overall housing land supply figure for East Dorset, but wishes to ensure that the housing land supply considers the sites now under construction in the village, and the housing target identified through the Neighbourhood Plan.

# **Development Plan Context**

- The housing target (in Policy CEDLP KS4) is based on the 2012 SHMA and covers the 15 year period from 2013 2028. It is expressed as:
  - 5,000 homes within existing urban areas (in the supporting text this is estimated as
     2,250 in Christchurch and 2,740 in East Dorset)
  - 3,465 as new neighbourhoods at Christchurch, Burton, Corfe Mullen,
     Wimborne/Colehill, Ferndown/West Parley and Verwood
- This comes to a total of about 8,490 dwellings over the 15 years, the equivalent of 566 dwellings per annum (dpa). Appendix 1 of the CEDLP makes clear that there was no intent to split this between the two constituent authorities, and as such there is no definitive target expressed for East Dorset in the adopted Local Plan. For the purpose of calculating the overall housing land supply requirements for the East Dorset area, under national planning policy, this policy is no longer relevant.
- Policies CEDLP LN1, 3 & 6 deal with the size and type of new dwellings, provision of affordable housing, and housing and accommodation proposals for vulnerable people.

  Whilst the mix of housing is not specified in the appeal proposals, these factors will have a bearing on viability and are likely to be relevant to any discussion on appropriate conditions and/or planning obligations.
- The ANP includes a housing target for the parish for the period 2022-2034. This has been considered and agreed with Dorset Council. The basis for the target is set out in Appendix 2

of the ANP, and considers a range of factors. The method is very similar to the many other Neighbourhood Plan housing targets used and accepted across Dorset. The analysis concludes that an appropriate housing target for Alderholt falls within the range of 4 – 16dpa, and a housing target of 16dpa (at the very upper end of the range) has been used in the Neighbourhood Plan, equating to 192 dwellings over the 12 year period. This is referenced in paragraph 4.1.3 of the ANP, and is referred to in Policy 7, which states:

"Sufficient land is allocated in the Neighbourhood Plan, which together with the extant planning consents and potential for further sensitive infill within the village envelope, should meet the identified housing target over the plan period. Given the identified supply exceeds the housing need requirement, the release of unallocated greenfield sites for open market housing outside of the village envelope should be resisted."

3.6 The Appellant responded to the consultation on the ANP at Regulation 14 (and prior to that at the Options Consultation) and did not raise any specific objection to the proposed housing target (but instead chose to question the deliverability of the site allocations and level of affordable housing likely to be provided in relation to ANP Policy 7). The Appellant's responses to those consultations are attached as Appendix A1.

# National Planning Policy and Guidance

- 3.7 NPPF paragraph 6o reiterates the Government's objective of significantly boosting the supply of homes, and that "it is important for sufficient land to come forward where it is needed" to meet as much of an area's identified housing need as possible, including an appropriate mix of housing types for the local community.
- 3.8 NPPF paragraphs 77 81 set out the broad parameters for calculating and monitoring the housing land supply, and more detail on this is provided in the associated guidance.
- 3.9 NPPF paragraph 82 states that, in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Specific reference is made to the use of rural exception sites as a means of providing affordable housing to meet identified local needs, and potentially allowing some market housing on these sites to help facilitate this.

3.10 NPPF paragraph 83 states that, to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, and that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

# Housing Need and Supply – East Dorset Area

- As set out in the SoCG, the Council's latest housing land supply report for the East Dorset area, published in January 2024 and based on information on completions and commitments as at end March 2023, shows a 3.9 year housing land supply based on an annualised requirement of 458 dwellings. The actual supply is disputed by the Appellant.
- The Standard Method includes an affordability adjustment which takes into account market signals (in this case requiring a 40% capped uplift over the household growth projections), and the housing land supply requirement calculation applies a buffer based on past delivery rates (in this case 5%, given that at least 85% of the housing requirement has been delivered over the past three years), and as such there is no need to factor in a further adjustment for these matters in determining the adequacy of the housing land supply.
- It is now agreed between the main parties that the housing land supply in relation to the application of the planning balance needs to be assessed against a 5 year target, based on the recent relevant appeal decision dated 8 May (APP/D1265/W/23/3323727³), and this is not contested by the Parish Council.

# Factors that may influence the weight to be given to housing in the planning balance

The judgment in Hallam Land Management Ltd v Secretary of State [2018] EWCA Civ 1808 makes clear in paragraph 51 that the weight to be given to the benefit of providing housing to overcome a shortfall in the supply of housing land is a matter for the decision-maker's planning judgment, but

<sup>&</sup>lt;sup>3</sup> https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3323727&CoID=0

"is likely to depend on factors such as the broad magnitude of the shortfall, how long it is likely to persist, what the local planning authority is doing to reduce it, and how much of it the development will meet."

3.15 Whilst not directly relevant to the decision on the application of the tilted balance, the housing need and supply in the parish is of potential relevance in this context.

## Housing Need and Supply in the Alderholt Neighbourhood Plan Area

- With reference to the NPPF and relevant paragraphs in Section 5 (Delivering a sufficient supply of homes), the ANP has assessed the need for housing in this area as 192 dwellings over the period 2022 2034. In the context of affordable housing need, the ANP recognises that, as at December 2022, the affordable housing need from households with a local connection was recorded as 18 households, with a further 8 applications not yet assessed (26 total) (source email provided in Appendix A2). Data from May 2024 is broadly similar (also included in Appendix A2), with 21 households with a local connection recorded, and a further 4 applications to be assessed (25 total) showing no increase in local need over the last 18 months.
- As of April 2022 (the start of the proposed plan period) there were extant consents for 138 dwellings, including 7 affordable dwellings. Two of the sites which had consent are now under construction. The largest, a brownfield site that previously had the Surplus Stores, was granted permission for 89 dwellings in 2015. Whilst its development initially stalled, Antler Homes PLC, a housebuilder based in Surrey and operating across southern England, commenced work on site last year and the first dwellings had been constructed to roof height by April 2024, which I saw on my visit. The other major site, for 44 dwellings (net), is on land north of Ringwood Road. The reserved matters permission was granted in July 2023, and Cllr Logan has confirmed to me that the builder, Hampshire-based Pennyfarthing Homes, has started on this site. Both sites are included in the housing land supply for East Dorset for delivery within the next 5 years, and more than meet the equivalent 5 year housing target for the parish (5 x 16 = 80 dwellings plus buffer).
- 3.18 The Neighbourhood Plan is proposing to allocate three more sites to deliver in the region of 50 55 homes, which in addition to the extant consents, and allowing for some infill within

the village envelope, will comfortably meet the proposed housing target of 192 homes. The site promoters are aware of the affordable housing requirements and have not raised any concerns regarding its provision either through the consultations or in response to my direct queries to them.

#### Broad magnitude of the shortfall

3.19 Based on Dorset Council's position, which the Parish Council supports, the shortfall is 1.1 years against a 5 year supply. The Appellant is challenging this and suggests a shortfall in the region of 2.1 years. As outlined above, there is no shortfall when the same requirements are considered at a local (Neighbourhood Plan) level.

#### How long the housing supply issues are likely to persist

The latest published housing land supply report for the East Dorset area does not include information with regard to the 6-10 year delivery pipeline. There is no shortfall at a local (Neighbourhood Plan) level. There is uncertainty as to whether the Appellant's proposed development will be able to make any substantive in-roads into the strategic housing shortfall within the 5 year period. The application is outline, and there remains uncertainty regarding the potential need and timescales associated with the prior extraction and re-use of minerals that does not appear to have been resolved (section 5.59 – 5.69 of the Appellant's planning statement and response from the Minerals and Waste Planning Team). The requirement for, and costs / benefits of, mineral extraction do not appear to feature in the submitted viability statements (the May 2023 site-wide Viability Assessment refers only to mineral extraction as an abnormal cost which has been excluded pending ground investigation results) or in the latest phasing plan.

## What actions are being taken by the Local Planning Authority

Dorset Council first published a Housing Delivery Test Action Plan in March 2022, and this was last updated as part of the annual review in March 2024<sup>4</sup>. With regard to the main issues contributing to under-delivery, within East Dorset these primarily relate to:

<sup>4</sup> https://www.dorsetcouncil.gov.uk/documents/35024/2390380/Housing+Delivery+Test+Action+Plan+-+March+2024.pdf/7b38ba94-1e8d-3729-d637-43ecef287918

- large swathes of the plan area being subject to National Landscape (AONB) and
   Green Belt designation;
- the nature conservation designations, including European sites both within and in close proximity to the plan area, meaning that developments often need to provide site specific mitigation requiring agreement with external bodies;
- reliance on private sector builders and their commercial decisions to progress and build out applications in a timely manner at a time of considerable economic uncertainty and fluctuation in the price and availability of materials and labour.

Previous concerns regarding inefficiencies in processing applications have now been addressed.

- The Council has identified a wide range of measures to help bring forward suitable sites in a timely and efficient manner. These are set out in Table 3 of that report, including:
  - Progressing the review of the Local Plan;
  - Working with partners to find a solution to nutrient neutrality.
  - Streamlining the application process to speed up decision-making;
  - Meeting with developers of major sites at the pre-application stage or earlier to discuss barriers which may be affecting site delivery;
  - Working with Homes England and other strategic partners to bring forward Councilowned sites, the Building Better Lives programme, affordable rural exception sites and large sites that have stalled, and supporting community land trusts to deliver new housing.

#### Conclusions in Issue 1

- 3.23 Whilst there is no dispute that the housing need across the former East Dorset area is significant, including care home and affordable housing need, there are a number of additional factors that should be considered in determining the weight to attribute to the proposed development in addressing this shortfall. This should include:
  - the magnitude of the shortfall which is at least 1.1 years' equivalent and possibly as
     high as 2.1 years' based on the LPA and Appellants respective stances;

- the extent to which the development will address this need which may be negligible in the 5 year period given the outline nature and complexities of the scheme;
- what is being done elsewhere to address the unmet need the LPA have an up-todate action plan that includes a wide range of measures that they are keeping under review;
- whether the proposed development is responding to local needs and circumstances
   the evidence collected in relation to the Neighbourhood Plan does not suggest
   that there is any significant local housing need that will not be met through the
   Neighbourhood Plan proposals.
- I consider the weight to be accorded to the benefit of addressing this housing need as part of the planning balance (Section 6 of this proof).
- 4. ISSUE 2: WHETHER THE DEVELOPMENT WOULD BE APPROPRIATE IN
  THIS LOCATION HAVING REGARD TO THE CHARACTER OF THE SITE
  AND ITS SURROUNDINGS; ITS RELATIONSHIP TO ALDERHOLT AND
  OTHER SETTLEMENTS AND THEIR FACILITIES; ITS CONNECTION TO
  THE HIGHWAYS NETWORK; AND THE LOCAL PLAN SPATIAL STRATEGY
  AND THE EMERGING NEIGHBOURHOOD PLAN

## The Local Plan spatial strategy

within the settlement hierarchy. These RSCs are described as the "Main providers for the rural areas where residential development will be allowed of a scale that reinforces their role as providers of community, leisure and retail facilities to support the village and adjacent communities". RSCs form the fourth tier of the hierarchy, recognised specifically as rural in character, with no strategic allocations, but with the ability to identify rural exception sites (under Policy LN4), new services and facilities (under Policy LN7) and potentially some economic development (under Policy PC4). The village envelope comes from saved policy A1 of the EDLP, which enables housing infill within that area, and which is

proposed to be extended to include the three new site allocations through the ANP (Policy 11).

- I have examined the 2017 appeal decision APP/U124o/W/17/3169111 in relation to Land North of Ringwood Road (known locally as The Hawthorns) to see if it provides assistance to this Appeal. I note that the site is in the same village, that the Local Plan policies (as a whole) were similarly considered out of date. In contrast to this Appeal, the development proposed on that site was of a much smaller scale, and the decision was made more than 6 years ago (and was therefore based on an early NPPF and a different housing land supply). The main conclusions I consider can be drawn are that:
  - both policies were taken into account in the decision, and as such were not considered to have no weight;
  - a conflict with Policy A1 (by building outside of the village envelope) will not necessarily be so significant to outweigh the benefits of a scheme; and
  - building outside of the village envelope does not automatically mean that the
    development conflicts with Policy KS2, and the Inspector refers to the scale of the
    development and its consistency with the settlement hierarchy in deciding this
    point.
- 4.3 Policy KS4 refers to the housing target being met through development within existing urban areas (and the supporting text estimates the split between Christchurch and East Dorset) and development in new neighbourhoods at Christchurch, Burton, Corfe Mullen, Wimborne/Colehill, Ferndown/West Parley and Verwood. These two sources contributed 8,465 of the 'about' 8,490 housing target. The CEDLP does not define "urban areas" per se, but does include the following statements:
  - Para 11.1 the 'main urban areas' are described as Verwood, Three Legged Cross, St
     Leonards, St Ives and West Moors
  - Policy KS2 refers to the district and suburban centres (Christchurch, Wimborne Minster, Ferndown and West Parley, Verwood, Corfe Mullen, Colehill, St Leonards and St Ives) as being with the existing urban areas
  - reference to saved policy HODEV2 references both urban areas and village envelopes

- reference to saved policy A1 refers to Alderholt as having a village envelope
- 4.4 This appears to imply that Alderholt was not part of the urban area target, and that the housing target was anticipated to be met in full in the larger settlements (other than a shortfall of about 25 dwellings). As such there would be no 'need' for development in Alderholt other than as may be considered necessary to support the village and adjacent communities (as per Policy KS2), and that the scale of such growth was not substantial.
- With reference to development needed to support adjacent communities, Alderholt adjoins Cranborne, Edmondsham and Verwood parishes in East Dorset (with New Forest district to the east). The village of Cranborne is similarly classed as a Rural Service Centre (and therefore would be expected to meet its own needs and that of any outlying hamlets), and Verwood is classed as a main settlement where a new neighbourhood is planned. The main built up area of Edmondsham is closer to both Cranborne and Verwood than it is to the village of Alderholt, and limited development would be considered acceptable there under Policy KS2 provided that it "supports the role of the settlement as a provider of services to its home community". As such, there are no 'adjacent communities' outside of the parish that would obviously look to Alderholt to meet their needs.
- On this basis, I agree with Dorset Council that the proposed development conflicts with settlement hierarchy which seeks to direct development to the most sustainable locations.

  It also conflicts with the associated policies that relate to the settlement hierarchy, as noted above.
- 4.7 This conflict is significant in its scale the expansion proposed would more than double the existing population of Alderholt, and is significantly higher than the level of development proposed at the highest tier 'main settlements' where the greatest scale of development through new neighbourhoods was for 1,260 homes at Wimborne (which adjoins the suburban centre of Colehill and therefore is effectively similar in size to Verwood), as shown in the following table.

Figure 1. East Dorset Settlement Hierarchy by population and proposed growth

Settlement	Status	2011 pop	p CEDLP Proposals		% growth
Ferndown & West Parley	1 - Main Settlement	21424	FWP3,4,6,7	66o	3.1%
Verwood	1 - Main Settlement	13360*	VTSW4,5	295	2.2%
Corfe Mullen	1 - Main Settlement**	10133	CM1	250	2.5%
West Moors	2 - District Centre	7561			
Colehill	3 - Suburban Centre	6907			
St Leonards & St Ives	3 - Suburban Centre	6859			
Wimborne	1 - Main Settlement	6790	WMC5,6,7,8	1260	18.6%
Alderholt	4 - Rural Service Centre	2848*			
Three Legged Cross	4 - Rural Service Centre	1492*			
Sturminster Marshall	4 - Rural Service Centre	1490*			
Holt	5 - Village	1273			
Sixpenny Handley	4 - Rural Service Centre	906*			
Cranborne	4 - Rural Service Centre	606*			

<sup>\*</sup> using built up area as opposed to parish estimate

- 4.8 The resulting population growth, at an average occupancy level of 2.26 persons per household (based on the 2021 Census data for East Dorset) would result in Alderholt's population increasing to in excess of 7,000 residents. This is significantly higher than any other RSC and would result in a population level similar to (and in some cases higher than) that of higher tier settlements.
- 4.9 Whilst the Local Plan does not define the community, leisure and retail facilities that are expected to be present in an RSC, it follows that an RSC is not expected to be as self-sufficient as the higher-level settlements, or to require the level of growth to become so. If this were the case, then significant growth would have been planned at these settlements (as new neighbourhoods) and referenced in the housing distribution in the Local Plan and associated Infrastructure Delivery Plan.
- 4.10 It is my opinion that the spatial strategy remains a relevant consideration despite the housing land supply situation, given that it is broadly consistent with the NPPF and still of relevance in achieving sustainable development. The following sets out my reasons for this opinion:

<sup>\*\*</sup> part of the main built-up area of Bournemouth, Christchurch and Poole

- the strategy has made provision for larger scale development in settlements that
  are well located and will limit the need to travel and offering a genuine choice of
  transport modes, and will be supported by the necessary infrastructure and facilities
  (in line with NPPF paragraphs 74 and 109);
- the strategy allows for development at all settlements, at a scale relative to their location, function and requirements, . (in line with NPPF paragraphs 82);
- the strategy does not set out any blanket restrictions on the quantum of development, and includes measures to address the possibility that housing delivery falls significantly below the housing target;
- there is still a rationale for defined boundaries to protect the countryside and focus growth within settlements, accepting that, on their merits, applications for housing can and have been approved outside of these boundaries.

# The character of the site and its surroundings

#### Development Plan Context

- 4.11 The Local Plan expects development to be compatible with or improve its surroundings (Policy CEDLP HE2 and EDLP DES11). With regard to density, Policy CEDLP LN2 states that "the design and layout of new housing development should maximise the density of development to a level which is acceptable for the locality" but recognises that densities of less than 30dph may be appropriate where higher densities would conflict with the local character and distinctiveness of an area.
- Policy CEDLP HE<sub>3</sub> requires development to protect and seek to enhance the landscape character of the area, and refers to the following factors being considered:
  - the character of settlements and their landscape settings;
  - natural features such as trees, hedgerows, woodland, field boundaries, water
     features and wildlife corridors;
  - features of cultural, historical and heritage value;
  - important views and visual amenity; and
  - tranquillity and the need to protect against intrusion from light pollution, noise and motion.

Policy CEDLP PC4 (referred to in the next topic) is also relevant insofar as it requires economic development to be "small scale to reflect the rural character."

#### National Planning Policy and Guidance

- 4.14 NPPF paragraph 135 requires planning policies and decisions to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). NPPF paragraph 128 supports higher density developments (that makes efficient use of land) but recognises that the desirability of maintaining an area's prevailing character is a consideration in determining appropriate densities. NPPF paragraph 139 requires development to reflect local design policies.
- 4.15 NPPF paragraph 180 states that planning decisions should contribute to and enhance the natural and local environment, recognising the intrinsic character and beauty of the countryside. Paragraph 191 goes on to state that decisions should also ensure that new development is appropriate for its location including considerations of light pollution, noise and disturbance to tranquil or intrinsically dark landscapes and nature conservation.
- 4.16 NPPF paragraph 132 notes that "Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers"

# The character of the area

- 4.17 The origins of the village is well recorded and researched by local parishioners and evidenced in the archives printed in the parish magazines<sup>5</sup>. These archives help to explain the following historic overview.
- 4.18 The main development of Alderholt as a village of any size dates back to the mid c19th when the main road connecting Cranborne with Fordingbridge was made up, and the Salisbury and District railway was built, running from Alderbury to West Moors. Major landowners, including Lord Salisbury (of Cranborne) and Squire Churchill (of Alderholt Park), constructed a number of estate style cottages along the road, which still stand today.

<sup>&</sup>lt;sup>5</sup> Submitted for the Core Document library

The old school on Daggons Road dates from 1847, and St James's Church was built in 1849. The station in Alderholt opened in the 1870s, and by the turn of the century a number of brickworks had sprouted up in the area, extracting the local clay for brickmaking. The Reading Room was constructed in 1904 on land donated by Lord Salisbury. The limited size of the village historically is reflected in its lack of any Listed buildings within the village envelope.

- By the early 1900s the village had just under 200 homes and a population of about 700 persons, with very modest, incremental increases in its size and population up until the 1970s according to Census records<sup>6</sup> (Appendix A<sub>3</sub>).
- Whilst the railway closed in the mid-1960s, instead of stagnating there was a period of further growth linked to the installation of mains drainage in the early 1970s, the absence of which had been a factor limiting potential growth at that time. A Village Plan<sup>7</sup> was drafted to ensure that further development was staged in relation to the improvements in the roads and drainage, and to reserve land for a public playing field and a new school (should it be required). At that time the school was west of the village on Daggons Road, and there were four shops, a pub and petrol filling station along the main route. According to the appraisal in the Plan, the village functioned "partly as a farming and forestry community and partly as a dormitory area for neighbouring towns". The potential for further shops close to Station Road on land opposite the school site, and expanding the industrial area close to the former Station site (the Surplus Stores site), were noted. The Plan also noted the importance of prescribing a limit to development "having regard to the rural character of the area, and the desirability of concentrating development to consolidate what is at present a rather diffuse settlement strung out along the main road serving the locality."
- As a result of this Plan there was a significant growth in the population between 1971 –
  1991, and the new school was opened in 1983. By 2001 the level of growth had returned to
  its previous modest levels of increase. Based on the extant planning consents now under
  construction, there will be a more moderate increase in parishioners this decade.

Vision of Britain website <a href="http://www.visionofbritain.org.uk/unit/10447550/cube/TOT\_POP">http://www.visionofbritain.org.uk/unit/10447550/cube/TOT\_POP</a>

<sup>&</sup>lt;sup>7</sup> Draft Alderholt Village Plan, August 1971 <a href="https://consultation.dorsetcouncil.gov.uk/spatial-planning/alderholt-np/user\_uploads/1971-village-plan---merged.pdf">https://consultation.dorsetcouncil.gov.uk/spatial-planning/alderholt-np/user\_uploads/1971-village-plan---merged.pdf</a>

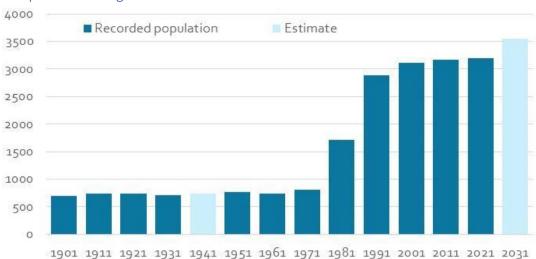


Figure 2. Population change – Alderholt<sup>8</sup>

- Alderholt Parish Council undertook a household survey in March / April 2017, when the potential large-scale expansion of the village was being considered by the former East Dorset District Council (Appendix A4). A total of 460 responses were received, representing just over one third of all households in the parish. When asked about what was important for Alderholt's future (key issues / priorities) common responses in the 2017 household survey were:
  - the need to retain the village feel of Alderholt in its rural setting,
  - that development should be well designed and generally small scale (not large housing estates) and include enough parking for likely car ownership levels,
  - the need for workplaces in the village to help reduce the level of commuting,
  - the affordability of homes (for those who have grown up in the village but are struggling to get onto the housing ladder),
  - the importance of better infrastructure, especially the road network into and out of the village, and public transport.
- The final question in the subsequent 2019 village survey asked residents to list anything or things they particularly valued in the village (Appendix A<sub>5</sub>). The top response, by 51% of the respondents, was the rural setting of the village. The next highest suggestiond, both mentioned by 37% of respondents, were the shops and the 'village feel'.

<sup>&</sup>lt;sup>8</sup> Data sources: 1901 – 1971 Vision of Britain website <a href="https://www.visionofbritain.org.uk/unit/10447550/cube/TOT\_POP">https://www.visionofbritain.org.uk/unit/10447550/cube/TOT\_POP</a>, 1981 – 1991 EDLP Chapter 14 and 2001, 2011, 2021 Nomis website <a href="https://www.nomisweb.co.uk/">https://www.nomisweb.co.uk/</a>.

- 4.24 Many of these factors were repeated again at the focus session for the Neighbourhood Plan, in early 2022<sup>9</sup>. This influenced the vision and objectives for the ANP, which were highly supported through the options consultation in July 2023. These included:
  - that Alderholt remains a village;
  - the importance of protecting and retaining its character its compact form and quiet nature, its links to the former railway, historic buildings and the surrounding countryside
  - the importance of protecting the intrinsic beauty and enjoyment of the countryside and approaches to Alderholt
- The ANP recognises that Alderholt's character is derived from these two main phases of 4.25 development. The early village footprint character area covers an area of approximately 33ha and is focused along the B3078 (Daggons Road, Station Road and Fordingbridge Road), together with the two roads that head south (Ringwood and Hillbury Roads), where the built-up area extended to prior to the 1971 Village Plan. As the character area is focused along these roads – the B3078 being the main through route, with Hillbury and Ringwood Roads having lower traffic levels, effectively splitting the south-bound traffic – it provides the dominant character to the village for those passing through the area or visiting the main community venues such as the village hall, pub and local store. This character area contains a mix of old and new building styles (as a result of infilling the more dispersed historic development), that reflects the slow, staggered growth across many decades, different builders, and individuality within many of the plots. It also has a close relationship with the surrounding woodland and farmland, as these are clearly visible from the main routes, with Strouds Firs adjoining a long stretch of Station Road, Bonfire Hill adjoining a long stretch of Hillbury Road, and farmland adjoining much of Ringwood Road.

<sup>&</sup>lt;sup>9</sup> Appendix 1 of Alderholt Neighbourhood Plan Consultation Statement https://consultation.dorsetcouncil.gov.uk/spatial-planning/alderholt-np/user\_uploads/consultation-statement-240513v3.pdf

<sup>&</sup>lt;sup>10</sup> The paramics model provided in the Transport Assessment (Appendix O page 323) shows a 2019 baseline for AM trips of 396 along the B3078 (Daggons Road) west of the village, 310 along the B3078 within the village on Station Road, and 563 on the B3078 (Presseys Corner) east of the village. To the south Harbridge Road recorded 361 vehicles, with these split between Hillbury Road (265) and Ringwood Road (127). A similar pattern is seen in PM trips, with 473 along the B3078 (Daggons Road) west of the village, 382 along the B3078 within the village on Station Road, and 705 on the B3078 (Presseys Corner) east of the village. To the south Harbridge Road recorded 406 vehicles, with these split between Hillbury Road (373) and Ringwood Road (148).

4.26 The remaining built-up area of approximately 37ha comprises the planned 1970s development and other modern infill areas, where there are different estate styles depending on the decade in which the housing was built. These lack the variety and visual interest that the early village footprint character area has, but are typical of their time, well-placed to access the key facilities in the village, and as these are largely away from the main through routes they are far less influential on the village character.

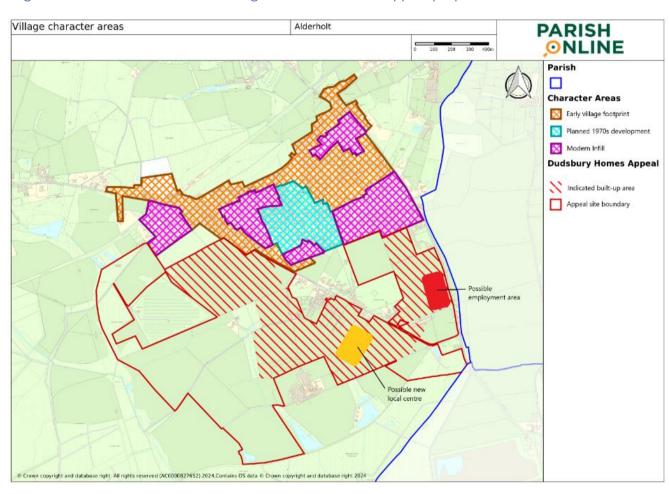


Figure 3. Character areas of the village with reference to appeal proposals

- The development proposals subject of this appeal would very much alter the character of the village. Notwithstanding the prolonged period of construction which in itself will impact on the village character, it proposes to:
  - increase the built up area (approximately 70ha) by a further 42ha (which is an area larger than the early village footprint and approximately 60% of the size of the existing village);

- include a much higher density of development at an average density above 30 dph,
   the overall average density in the village is comparatively low at typically 15 dph,
   with some areas of higher density around 25dph<sup>11</sup>;
- increase the level of traffic on the local road network;
- introduce a new local centre and an employment area significantly removed from the B<sub>3</sub>078 Daggons Road / Station Road, which is and always has been the historic focus of these activities;
- change the character of both Ringwood Road, by effectively divorcing it from its
  relationship with the countryside (whether or not a stretch of Ringwood Road is
  downgraded to access only with the supposed intent of retaining its rural character),
  and the character of the countryside setting of the western edge of the village by
  changing this from farmland to more actively used accessible greenspace and solar
  arrays.
- Whilst the application is outline in terms of the design, it is my experience that, given the scale of the development, the housing areas are also likely to be clearly identifiable as being built by a limited number of volume housebuilders, with a higher degree of homogeneity based on the repetition of designs (albeit with some variation) and use of materials than is typical of the early village footprint. There is also some uncertainty regarding the area that the business park will require or the scale of units at this outline stage (the 10,000m² in the description refers to the amount of employment space in the form of a business park, and the land use budget is not fixed), and as such whether the employment area would be "small scale to reflect the rural character." in accordance with the development plan requirement Policy CEDLP PC4.

The relationship of the development to Alderholt and other settlements and their facilities

#### Development Plan Context

The Settlement Hierarchy is set out in Policy CEDLP KS2 and has been covered in the first section on this issue. Policy CEDLP KS9 adds further to this, setting out the Transport Strategy, and states that "development will be located along and at the end of the Prime

<sup>&</sup>lt;sup>11</sup> A density map is included at the start of Chapter 3 of the ANP

Transport Corridors in the most accessible locations and supported by transport improvements that will benefit existing and future communities" Map 4.6 of the CEDLP identifies the Prime Transport Corridors, and there are none in Alderholt parish. Policy CEDLP KS11 the requires development to "be in accessible locations that are well linked to existing communities by walking, cycling and public transport routes.".

- A-30 Policy CEDLP LN7 and PC5 together allow for local facilities and services to support existing and future population growth in Alderholt (LN7 relating to facilities such as education, health, and community buildings, and PC5 to shops and leisure facilities which provide for people's day to day needs). In relation to community facilities, preference is given to the efficient use and expansion of existing buildings (where well-located) to allow for the colocation of facilities and services, and where this is not feasible, new facilities are supported with preference given to the clustering of services. In all cases, the loss of existing facilities and services is resisted if it would result in a substantial decline in the range and quality of facilities and services for local people. The supporting text to LN7 highlights that the Core Strategy Infrastructure Delivery Plan sets out what services and facilities will be required, and that this has been identified in partnership with service providers and utility companies.
- 4.31 Policy CEDLP PC1 sets out the Employment Land Hierarchy which is intended to influence the location of employment uses. There are no employment sites or proposals identified for Alderholt. Policy CEDLP PC4 on the Rural Economy encourages economic development "in or on the edge of existing settlements where employment, housing, services and other facilities can be provided close together" (and as such applies to Alderholt) provided that the development would be "small scale to reflect the rural character."

# National Planning Policy and Guidance

- 4.32 NPPF paragraph 109 states that the planning system should actively manage patterns of growth, focusing significant development on locations which are or can be made sustainable. It recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both planmaking and decision-making.
- 4.33 NPPF paragraph 97 requires planning policies and decisions to plan positively for the provision and use of community facilities (such as local shops, meeting places, sports

venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments, supports the retention and improvement of established shops, facilities and services for the benefit of the community, and encourages an integrated approach to considering the location of housing, economic uses and community facilities and services. Paragraph 99 places a particular emphasis on having a sufficient choice of school places available to meet the needs of existing and new communities. Paragraph 88 states that planning policies and decisions should enable the sustainable growth and expansion of businesses in rural areas, and the retention and development of accessible local services and community facilities.

# A brief overview

- 4.34 Whilst Alderholt is one of the larger villages in East Dorset, like many villages it looks to a number of settlements for its higher level functions. The 2019 village survey sought to establish a better understanding of what services, facilities and employment opportunities parishioners accessed in the village, and where they accessed these further afield. A total of 420 responses were received, representing 939 parishioners and approximately one third of all households in the parish. Key statistics from this survey, relating to people's travel patterns and use of facilities, are included in Appendix A5. These show:
  - In terms of work patterns, there was no 'main' destinations with the workforce scattered across the area. The data suggests that about 16% work in Alderholt, including 7% working from home, and a further 11% have no fixed place of work. This leaves 73% of workers based outside of the village, with the most common workplaces being Fordingbridge, Bournemouth, Ringwood, Salisbury and Southampton, each accounting for between 6 10% of the work-related traffic.
  - In terms of shopping patterns, for groceries this is primarily split between Ringwood, Verwood and Fordingbridge. Most respondents (65%) said that they do their food shopping as a single-purposes trip, with work journeys being the main factor for a combined trip (12%). Whilst many parishioners (81%) said that they use the local Co-op Food Store at least weekly, very few (7%) use it regularly for their main food shop. People tend to travel further for other goods, with Salisbury and Bournemouth being the most common centres visited for items such as clothing.

- In terms of local facilities, parishioners responding to the survey said they frequently use the Co-op Food Store, with the village hall, recreation grounds, Wolvercroft Garden Centre (where there is a café / restaurant), churches and pub (and also at that time the branch surgery for the medical practice) being reasonably well used (i.e. at least 1 in 4 households said that they used these facilities at least once a month). The main facilities and services that parishioners felt were missing or could be improved were the bus service, healthcare, and having a greater range of local shops and services.
- 4.35 The Appellant seeks to make the case that the provision of additional employment and facilities to support the existing and proposed housing would be beneficial in reinforcing and enhancing the function of Alderholt as a Rural Service Centre. The Appellant's SoC notes the past loss of shops, the petrol filling station, Doctor's surgery and veterinary practice and purports that the development would provide a range of services to reduce the requirement for residents to have to travel to other locations.
- 4.36 With reference to the lack of a veterinary practice whilst the former owner and practitioner retired in 2023, the practice was passed on and is now run as Ocean Vets from its premises at The Beeches on Fordingbridge Road<sup>12</sup>.
- 4.37 The other points are also strongly disputed, for the reasons set out below and in the following section relating to highways matters.
  - Shops and services and the proposed Local Centre
- In terms of retailing and other main town centre uses, as confirmed by Cllr Logan and referenced in the Alderholt Archives, the significant increase in population between 1971 and 2001 did not result in an increase in local shops and services whilst there was public investment in a new school, the petrol filling station closed during this time, as did the Surplus Store, a local restaurant (formerly the village bakery) on Pressey's corner, several smaller shops and one of the branch surgeries, with the Post Office (which had been opposite the Churchill Arms) amalgamated into the enlarged convenience store. The

<sup>&</sup>lt;sup>12</sup> As can be seen from visiting the village and through their website <a href="https://www.oceanvets.uk/">https://www.oceanvets.uk/</a> and facebook pages <a href="https://www.facebook.com/oceanvets/?paipv=o&eav=AfbVNVBalFwhlVzALKt2GajWUnMUl7GFBasSbWG8nBVwqtLACdJ1ewaMPfqBCdQTMN4&\_rdr">https://www.oceanvets.uk/</a> and facebook pages <a href="https://www.oceanvets.uk/">https://www.oceanvets.uk/</a> and facebook pages <a href="

potential for additional shops opposite the school site, as suggested in the Village Plan, never materialised. It is clear from this that there is no direct correlation between population and the sustainability of shops and services.

Dorset Council's latest Retail and Leisure Needs Assessment<sup>13</sup> explains how "the 4.39 challenging economic conditions and growth in online sales have had a significant and permanent impact on consumer shopping and spending behaviour. This has created significant challenges for traditional 'bricks-and-mortar' retailing and the high street." It guotes data showing that the UK lost 11,000 shops in 2020, with a further 18,000 estimated to close in 2021. It notes the high numbers of retailers that have either closed or have significantly reduced their store portfolios, and the move away from the provision of new large store grocery supermarkets (with the main growth in new stores coming from 'deep discount' food operators such as Aldi and Lidl). I note that Aldi and Lidl are currently advertising an interest in new stores with a catchment of 15 - 20,000, on a prominent main road frontage with good visibility and access, customer parking for at least 100 cars<sup>14</sup> (Appendix A6). Site size requirements start from a minimum of 1.5 or 2 acres (0.6 – 0.8ha) – more than half of the suggested land area for the local centre. Within the local area, Aldi are specifically targeting the much larger towns of Dorchester and Winchester, and Lidl are targeting Salisbury, Sherborne and Wimborne. Furthermore, the Retail and Leisure Needs Assessment forecasts that the potential capacity (based on predicted levels of housing growth across the county) is likely to be modest and not of a sufficient quantum to justify identifying and allocating new sites, particularly as the capacity can be met by the take-up and/or repurposing of vacant units and sites within the main centres and prime shopping locations. The Assessment goes on to conclude that:

Today, many of our traditional towns and shopping centres simply have too much retail space. The critical challenge over the short, medium and long term will be how to retain existing businesses, fill/replace the voids and attract new investment.

and

<sup>&</sup>lt;sup>13</sup> Dorset Retail & Leisure Study - 2022 Update, prepared by Lambert Smith Hampton for Dorset Council, January 2023 https://www.dorsetcouncil.gov.uk/dorset-council-local-plan-evidence-and-background-papers

<sup>14</sup> https://www.realestate-lidl.co.uk/new-store-site-requirements and https://www.aldi.co.uk/corporate/property/required-towns

It will be important to maximise residential provision in the most sustainable locations, particularly in centres, as part of a balanced mix of uses. Therefore, consideration needs to be given to planning policies and allocations enabling the growth of other uses, such as education, leisure and recreation, within centres, which, along with residential, are particularly positive in terms of enhancing the vitality of centres.

- Based on the above data and current shopping patterns as recorded in the 2019 survey, whilst additional shops may be welcomed by parishioners, it seems highly unlikely that the proposed local centre will be attractive to a larger format supermarket store operator to change the current dispersed pattern of shopping evidenced in the 2019 survey. There is also no evidence that it will provide a suitable site for a new petrol filling station (and this is not included in the planning application), and no evidence of any significant demand for new retail outlets in this location, particularly taking into account the vacant premises in larger centres. The letter of support from Neighbourhub Limited, to deliver the local centre, comes from what appears to be a dormant company (1271646¹5) incorporated in July 2020 and which has returned three sets of accounts detailing zero employees and assets of £2, and their website <a href="https://www.neighbourhub.uk/">https://www.neighbourhub.uk/</a> is also lacking details of any past projects or experience (Appendix A7).
- Whilst the committee report outlines the negotiation and potential financial contributions (to be secured through a S106 agreement) in relation to sports and recreation facilities, these are not facilities that any significant number of local residents identified as inadequate through the 2019 survey, and several facilities (swimming and 3G sports pitches) are proposed as off-site contributions that would not be readily accessible to local residents as they are unlikely to be built in Alderholt. The committee report also included the potential for a £1.5 million financial contribution to a community hall within the local centre, which the applicant is suggesting could cater for indoor sports (they suggest it could provide a single sports court and could also be used for fitness classes) but as evidenced on the village hall's website<sup>16</sup>, (Appendix A8) the hall already caters for these types of activity (short mat bowls, badminton and pilates being examples of regular activities), and

<sup>15</sup> https://find-and-update.company-information.service.gov.uk/company/12716346

<sup>16</sup> https://www.alderholtvillagehall.org.uk/activities/

therefore there is no clear additional benefit to parishioners other than mitigating potential harm.

With reference to the medical practice, whilst the Appellant's infrastructure plan refers to 4.42 'confirmed interest from a local GP practice', for both doctor and dental services, no evidence of this has been forthcoming. Alderholt Parish Council contacted the two local GP surgeries at Cranborne and Fordingbridge regarding the appeal proposals, and both have indicated that new premises in Alderholt (linked to their current practice) would be appropriate to serve the area based on the projected population increase that would arise from this appeal, and that there are no current plans or funding to make such provision (recent correspondence with the two GP surgeries is contained in Appendix A9). The email from the Cranborne Practice indicates that they would not be able to absorb the increase in patient numbers from their existing resources without significantly compromising their current services, and the consultation response from NHS Hampshire and IoW ICB, who cover the Fordingbridge surgery, highlights that the existing practice in Fordingbridge could not absorb the additional patients within its current site. The ICB have suggested that an initial building of 300m<sup>2</sup> should be available as part of the first phase of development, expanding to an eventual 600m<sup>2</sup> (and the committee report includes reference to a £1million allowance). It is not clear whether this level of provision is also appropriate should the Dorset-based Cranborne Practice provide services for the village. At the time of drafting this proof there was no detail regarding how the provision of a new surgery would be secured, and timescales for its delivery that relate to avoid adversely impacting on local services.

# **Education provision**

seeks to clarify the proposed strategy to address education needs. This proposes the expansion of the existing first school site to accommodate 2FE with a capacity of 300<sup>17</sup>. The report includes an indicative plan showing a 2 storey school including one year's equivalent of nursery provision (totalling 1,103m² ground floor, 1,945m² total floor area) located to the

<sup>&</sup>lt;sup>17</sup> It is noted that the assessment of additional pupil numbers is based on historic pupil numbers, and as such may not be accurate. The falling birth rate referenced may also linked to the Covid-19 pandemic.

rear of the site alongside a MUGA and area of informal play (600m²), with a sports pitch (2,100m²) and car park at the front. This plan would require the removal of a large group of Category A trees within the centre of the site, and building on the Local Green Space as proposed through the Neighbourhood Plan.

- The Dorset Council Assessment indicates the need for an unconstrained site area of 11,100m², and whilst the site measures 11,775m² it is particularly constrained by the tree coverage. The Appellant's strategy notes that the plan has a small under-provision of float area, and suggests that the playing fields could be located off-site. This appears to be likely to be required given the site constraints and Dorset Council's initial analysis of space requirements. The nearest area where playing fields could be accommodated within the Appeal site appears to be adjoining the play area and recreation ground marked as a recreation park with LEAP (on the masterplan). This space is approximately 320m from the site (reducing the time available for sports whilst classes move to and from the facility) and the shared use of facilities is not optimal for school safeguarding.
- The data analysis for school trip patterns is available for the 2016-17 school year<sup>18</sup> a year on from that used by the Appellant in their analysis. This was based on a sample of 78 of the 114 pupils on the school role at that time, and shows 77% of pupils walking to the school (with an average walking distance was 370m), and 88% of pupils live within 800m (described as the realistic walking distance threshold). 13% of pupils living within 800m of the school undertake the journey by car an increase on the previous year's data. Only 4% of the students were out of catchment, and 22% of pupils were driven to school by car / van. Assuming that 15 20% of all children at the school come by car (given the above), this would equate to some 45 60 cars dropping off and picking up children far higher than at present.
- The impact on pre-school nursery school provision does not appear to have been assessed.

  The First School currently makes provision for children from 2+ years (term time only) and there is separate provision through the privately owned Kingswood Day Nursery on Daggons Road, which runs year-round and caters for children aged 0 4 years. At the time

<sup>&</sup>lt;sup>18</sup> http://sthc.co.uk/portals/dorset/Distance School Current.html?school id=835\_3000 as referenced in the Appellant's Education Mitigation Strategy

of the last Ofsted report in March 2022<sup>19</sup> the nursery had 87 children on its roll and capacity for 42 places (Appendix A10). Unless capacity is increased for younger children and outside of term time, it is likely parishioners will be unable to find local provision to meet their needs.

# Employment provision

- 4.47 The most recent Employment Land Study for the Dorset area<sup>20</sup> indicates that:
  - The office market is very muted, but the industrial market has active business requirements for new space;
  - Demand is particularly strong nearer to the BCP urban area along the A<sub>31</sub> and A<sub>35</sub>,
     and is also strong at Blandford Forum, Dorchester, Weymouth and Sherborne (via Yeovil). The secondary market towns all also show requirements for business space;
  - It would be reasonable for Dorset's market towns to be seeking to achieve close to or above 15 sqm of employment space per dwelling;
  - It would also be reasonable to expect concentrations of new space at: settlement expansions / mixed use sites, high levels of A Road connectivity and/or proximity to BCP urban area (where demand is reportedly particularly strong and viability best), notable economic drivers (Dorset Innovation Park, Portland Port), and interrelationships with more rural towns, with larger scale strategic sites potentially more deliverable than dispersed sites, including Eastern Dorset / proximity to BCP.
  - There are issues around deliverability and viability. This is particularly true for employment sites further from the BCP conurbation where rental values for speculative industrial units are too low in the face of ongoing rises in construction costs alongside achievable land values. This means that developers are not incentivised to bring forward new speculative units even where there is clear occupier demand, and further interventions are suggested to deal with this.
- 4.48 The guidance of a minimum of 15m² per dwelling would suggest that the proposed business park should seek to provide at least 25,500m² of employment space (2.5 times that

<sup>19</sup> https://files.ofsted.gov.uk/v1/file/50181483

<sup>&</sup>lt;sup>20</sup> Dorset and BCP Employment Land Study Final Report, March 2024, Iceni Projects <a href="https://www.dorsetcouncil.gov.uk/employment-land-study">https://www.dorsetcouncil.gov.uk/employment-land-study</a> - paragraphs 8.5 to 8.21

proposed by the Appellant), in order to provide sufficient employment space for the new residents. This would rise to over 45,000m² if Alderholt were to become more self-sufficient in this regard. However it is also noted that the Appellant's Commercial Property Development Viability Report recognises that even at 10,000m² the business park is likely to be speculatively built and delivered on a phased basis (despite there being no such employment site in the area and the current size of the village) – which appears to confirm the viability issues and concerns noted in the Dorset Council study.

- 4.49 I have also considered alternative sources for substantiating the relationship between employment and population, and these are set out below.
- The 2021 Census data records 1,591 parishioners being in employment (Appendix A11) an 4.50 average of 48.5 workers for every 100 houses. As this was during a difficult economic climate due to the Covid-19 pandemic, I have also considered the equivalent figure from the 2011 Census (which produces an average of 51.1). It is therefore reasonable to assume that a development of 1,700 homes should give rise to a working population increase of at least 825 people. As referenced above, the 2019 village survey indicated that about 7% of the workforce worked home at that time and a further 11% had no fixed place of work. The 2021 Census survey is considered an unreliable indicator, given that furloughing arrangements relating to the Covid-19 pandemic were still in place at that time<sup>21</sup>. The equivalent figure from the 2011 Census is 24% (Appendix A11). These figures will have been influenced by the lack of local employment opportunities - meaning that people would have a greater propensity have jobs based from home (the Dorset-wide equivalent being marginally lower in both Census records, and nationally the latest figures for fully home working was 16%<sup>22</sup>). As such, it is considered reasonable to assume that in the region of 25% of the workforce would not require employment premises. On this basis, a development of 1,700 homes would require workplace premises for at least 619 people in order to adequately cater for its own population.

<sup>&</sup>lt;sup>21</sup> The data from the 2021 Census records home working at 32%, with 18% of employees having no fixed place of work

<sup>&</sup>lt;sup>22</sup> Characteristics of homeworkers, Great Britain: September 2022 to January 2023 <a href="https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/characteristicsofhomeworkersgreatbritain/september2022tojanuary2023">https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/characteristicsofhomeworkersgreatbritain/september2022tojanuary2023</a>

- The Appeal proposals include the potential for employment in terms of 10,000m² of employment space in the form of a business park, together with retail, commercial, community and health facilities in the local centre, and the potential for an 80 bed care home. The details of these are not clear at this stage, the Appellant's viability report refers simply to the sale of the land for employment, PH and village centre at a total value of just over £10million, and makes no mention of the care home, and there are some assumptions made on the split within the more recently submitted Retail Impact Assessment. The Appellant's marketing report refers to the village centre including 4,000m² of retail, healthcare and community space, and that the employment land would incorporate Class E (former B1 light industrial/B1a offices), B2 general industrial and B8 storage and distribution uses, with a suggested split of 1000m² offices and 9,000m² as a mix of light/general industrial and storage and distribution use.
- these areas, and the method and calculations for this are set out in Appendix A12. These calculations suggest that the employment areas would cater for a workforce equivalent of between 553 640 people, falling to 484 558 people if office use is prohibited in the business park (as this falls within the definition of a main town centre use) and the local centre were to accommodate a Lidl / Aldi type supermarket. This is around the quantum referenced in the committee report (564 jobs under Section 14.0). It is significantly different from the 2,035 jobs suggested by the Appellant<sup>23</sup>. As with the conclusions of the most recent Employment Land Study, this too indicates that the provision made in the development mix is unlikely to provide sufficient jobs in the long term to cater for the workforce generated by the proposed housing. It is accepted that the actual degree of shortfall is difficult to accurately predict due to the assumptions that have to be made, and uncertainties relating to other factors (such as vacancy rates and take-up) that should also be factored in.
- 4.53 Both the Employment Land Study and my research indicate that the Appellants claims of the employment provision being beneficial in reinforcing and enhancing the function of

<sup>&</sup>lt;sup>23</sup> Paragraph 6.23, Alderholt Meadows, Alderholt, Transport Assessment, October 2022, Paul Basham Associates Ltd – there is not further explanation of this in the Appellant's planning statement or SoC

- Alderholt as a Rural Service Centre are not substantiated. Indeed, the figures suggest that the development is likely to increase the level of net out-commuting.
- 4.54 Finally, I note that, whilst the Appellant has provided a letter to evidence that a commercial developer is interested in providing some of the industrial floorspace (although this relates to 10,000sqft as opposed to 10,000m²), there is no indication that they accept the proposed valuation nor have signed any option to deliver this. As referenced in the previous section, there is also little evidence to suggest that the local centre will be purchased and built by a third party.

# The development's connection to the highways network

4.55 I defer to Mark Baker's expertise on this matter, and briefly summarise the key points from his proof of evidence here.

# Development Plan Context

4.56 Policy CEDLP KS9 sets out the Transport Strategy which states that "development will be located along and at the end of the Prime Transport Corridors in the most accessible locations and supported by transport improvements that will benefit existing and future communities" Map 4.6 identifies the Prime Transport Corridors, and there are none in Alderholt parish. Policy CEDLP KS11 the requires development to "be in accessible locations that are well linked to existing communities by walking, cycling and public transport routes.".

# National Planning Policy and Guidance

NPPF paragraph 74 deals specifically with the location of large numbers of new homes, including significant extensions to villages, and states that these should be "well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)." Paragraph 109 is also relevant, as it refers to actively managing patterns of growth, and makes clear that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 114 also sets out a number of criteria relating to the assessment of potential sites, and seeks to ensure that:

- sustainable transport modes are promoted;
- safe and suitable access to the site can be achieved for all users;
- 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.

# A brief overview

Mark Baker's evidence considers the proposed provision of public transport, evidence on 4.58 travel patterns in relation to the higher order settlements, and concludes that the appeal proposal is likely to lead to considerable levels of out-of-village movements for access to a wide range of services and facilities that residents can typically be expected to use on a regular / daily basis. It fails to offer a genuine choice of transport modes. To access the closest high-order settlements (Fordingbridge and Verwood) is a distance of at least 4.3km - nearly four times the maximum accepted distance to facilities – and this distance and the high-speed nature of the road network (or off-road route across the Common) would be a general deterrent to walking to facilities and services beyond the village itself. Similarly, the higher speed and nature of the local roads (between Alderholt and either Fordingbridge or Verwood) are likely to act as a significant deterrent to all but the most experienced cyclists, unless there were significant improvements to cycling infrastructure, and whilst some improvements have been suggested, significant improvements that are demonstrably deliverable have not been offered. The proposed public transport frequency and timings are poor and unlikely to be conducive as an alternative to the private car, onward links from Fordingbridge are particularly lengthy, and there is limited evening and weekend coverage. As such, the public transport benefits (including the proposed dedicated bus service) are highly unlikely to make any notable difference to the traffic levels. Overall, Mark Baker concludes that the proposal cannot be said in the context of the NPPF to be one which is or can be made sustainable through the proposals put forward in this Appeal.

# The emerging Neighbourhood Plan

4.59 The Parish Council has for some time considered the need to prepare a Neighbourhood Plan, and I was appointed to assist on this matter in late 2022. During 2023 work

progressed on identifying the vision and objectives for the Plan, testing the housing target for the area, followed by an assessment of potential site options, and work on design guidance. Several consultations took place, as outlined in the Consultation Statement, including the Options Consultation during July 2023 which asked for feedback on the various potential site options, local green spaces and views, and matters of design.

- The Regulation 14 Pre-Submission Consultation was approved by the Parish Council and ran between December 2023 and January 2024. This showed that the Plan was broadly supported by parishioners, and further changes were made to the Plan as necessary.
- Local residents have been very much engaged in the Neighbourhood Plan process with lay persons being part of the Neighbourhood Plan Committee, and more than 200 residents responding to the Options Consultation, and just under 100 residents responding to the Regulation 14 Pre-Submission Consultation (despite the potential for consultation fatigue arising from the earlier ANP consultations and developer consultations).
- The revised Plan was agreed at the Parish Council meeting in April 2024, and submitted to Dorset Council. The Council confirmed by letter dated 13 May 2024 that they were satisfied that the proposed Plan is compliant with the relevant legal requirements and that they intended to commence the Regulation 16 consultation, The consultation started on 15 May and runs for a period of 6 weeks.
- 4.63 As part of the Basic Conditions the ANP is legally required to contribute to the achievement of sustainable development. The Plan includes site allocations and policies, and its compliance with this requirement is demonstrated through the Strategic Environmental Assessment by AECOM<sup>24</sup> that accompanies the submission ANP.

# Key policies relevant to this appeal

4.64 I have identified the following Neighbourhood Plan policies as most relevant to the main issues identified in this appeal:

<sup>&</sup>lt;sup>24</sup> https://consultation.dorsetcouncil.gov.uk/spatial-planning/alderholt-np/user\_uploads/alderholt-np-sea-submissioner\_29-april-24.pdf

Figure 4. Neighbourhood Plan policies and main issues

Issue	NP policies	Main areas of conflict identified		
Housing Need	Policy 7. Meeting Local Needs –	The proposed development would		
and Supply	Housing	release an unallocated greenfield		
	Sets the local strategy for meeting	site outside of the village envelope		
	the Neighbourhood Plan housing	for open market housing.		
	target, and resists open market	NB Policy 7 also reflects the HRA		
	housing on unallocated greenfield	requirements and would be relevant		
	sites outside of the village envelope.	should adequate mitigation not be		
	Also covers the size and type of new	achieved. The policy also includes		
	dwellings, including the provision of	requirements relating to the size and		
	affordable housing and housing and	type of housing, including the		
	accommodation for vulnerable	provision and allocation of affordable		
	people.	housing, that would need to be		
	Policy 11. Revised Village Envelope	considered in the imposition of		
	Updates the village envelope.	conditions / the S106 agreements		
The character of	Policy 1. Settlement pattern, layout	Based on the indicative layout, the		
the site and its	and densities	density and spacing between		
surroundings	Policy 6. Landscaping	dwellings would not reinforce the		
	Policy 17. Key Landscape Features	area's green and rural character,		
	Includes the approach to design and	and does not provide for lower		
	layout on the edge of the settlement	density, more dispersed		
	and green spaces within the village.	development on the edge of the		
	Includes the importance of the	village with visual connections		
	winding hedge lined lanes, and	through to the countryside. The		
	mature oak trees that line the lanes	development would be likely to		
	around and approaching the village,	harm the character of the lanes		
	the sense of tranquillity and dark	approaching the village, the sense		
	night skies outside of the street-lit	of tranquillity of the countryside,		
	areas within the village.	and the dark night skies as		
		appreciated outside of the village.		
The relationship	Policy 8. The Village "High Street"	The development of a local centre		
of the	Identifies the area in which retail and	would be significantly outside of		
development to	other E class or similar uses	the area identified for such uses		
Alderholt and	appropriate to a local centre are	(along Daggons Road / Station		
other	encouraged.	Road) which is aimed at reinforcing		

Issue	NP policies	Main areas of conflict identified
settlements and	Policy 10. Meeting Local Needs —	the sense of a village centre/high
their facilities	Employment	street in this location.
	Sets the local strategy for	The scale, suggested mix and
	employment.	indicated location of the
	Policy 16. Local Green Spaces	employment area is also considered
	Is also relevant should the proposed	likely to adversely impact on the
	development be reliant on the	rural character of the area. However
	eastern section of the school,	the LVIA does not appear to assess the
	although this is not included in the	immediate views of this area and the
	planning application.	transport analysis does not provide
		details on HGV and similar trips to
		rigorously assess this.
		The school playing field (if required
		for the expansion of the First
		School) is protected as a Local
		Green Space.
		NB Policy 10 also includes
		requirements relating to the removal
		of PD rights allowing future conversion
		to residential use where new business
		premises are proposed on greenfield
		sites outside the village envelope, that
		would need to be considered in the
		imposition of conditions.

# Weight considerations

- 4.65 National Planning Policy (paragraph 48 of the NPPF) provides clear guidance on the factors that should be taken into account in determining the weight to be given to emerging policy.

  This should be based on assessment of:
  - (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
  - (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given);
     and

- (c) the degree of consistency of the relevant policies in the emerging plan to this
   Framework (the closer the policies in the emerging plan to the policies in the
   Framework, the greater the weight that may be given).
- Planning Authority publicity period on the draft plan being passed on 25 June (this is acknowledged as "at an advanced stage" within NPPF paragraph 49). It is anticipated that an Examiner will have been agreed prior to the conclusion of the Regulation 16 consultation, and it is likely that the Examiner's report should be issued within approximately 2 months of the consultation of the Regulation 16 consultation based on recent plans and experience<sup>25</sup> i.e. prior to the end of August 2024. A decision on the Examiner's recommendations, including whether the Plan should proceed to referendum, must be taken within 5 weeks of the report's receipt, and this decision is delegated to the Planning Portfolio Holder in Dorset Council. At that stage, Section 70(2) of the Town and Country Planning Act 1990, requires that, in dealing with an application for planning permission, the authority shall have regard to the post-examination draft neighbourhood development plan, so far as material to the application, effectively giving it the same full weight as a newly made Plan.
- In terms of the second criteria (b), the NPPG<sup>26</sup> references the use of the consultation statement<sup>27</sup> to reveal the quality and effectiveness of the consultation that has informed the plan proposals. Representations may also be made during the Regulation 16 consultation (which ends during the first week of the Inquiry). A summary assessment of the degree and significance of objections relating to the most relevant Neighbourhood Plan policies at this stage is contained in Appendix A13, based on the consultation statement. It should be possible to update this following the close of the consultation.
- 4.68 In terms of the third criteria (c), an assessment of the degree of consistency of the relevant policies in the emerging plan to the NPPF is contained in the submitted Basic Conditions

<sup>&</sup>lt;sup>25</sup> Most recently, the Sturminster Marshall Neighbourhood Plan concluded its Regulation 16 consultation on 1 March 2024, and the Examiner's report was received on 8 May. Prior to this the Hazelbury Bryan Neighbourhood Plan concluded its Regulation 16 consultation on 12 January 2024, and the Examiner's report was received on 28 February.

<sup>&</sup>lt;sup>26</sup> Reference ID: 41-007-20190509 https://www.gov.uk/quidance/neighbourhood-planning--2#decision-taking

<sup>&</sup>lt;sup>27</sup> https://consultation.dorsetcouncil.gov.uk/spatial-planning/alderholt-np/user\_uploads/consultation-statement-240513-v3.pdf

Statement<sup>28</sup>, and the findings from this relating to the most relevant Neighbourhood Plan policies is contained in Appendix A14. It is worth noting that Dorset Council did not raise any fundamental concerns regarding the policies and the NPPF at Regulation 14 - their full response is included as Appendix A15.

- 4.69 From the above, it is clear that some weight should be given to the Neighbourhood Plan policies, noting that it is at an advanced stage, and its consistency with the Framework as demonstrated. Whilst there are some unresolved objections, a number of these have been addressed by the revisions to the Neighbourhood Plan. Furthermore, there is no suggestion in the NPPF that any unresolved objections (however small) would require only limited weight to be given to the ANP the weight is a matter of planning judgement for the decision maker, taking into account the extent and significance of these objections.
- 4.70 To assist in guiding the Inspector on this matter, my findings on each of the three factors and potential weight advised against each of the most relevant policies and possible conflicts with the ANP is shown in the table below. This will need to be checked and updated as the ANP progresses, particularly in relation to the nature and relevance of comments made through the Regulation 16 consultation with reference to the test under 48(b).

Figure 5. Potential weight to be given to the most relevant policies in the emerging ANP.

Issue	ANP policy	48(a)	48(b)	48(c)	Proposed	
		stage	objections	objections NPPF		
Housing Need and	7. Local Needs –	Advanced	More significant	Consistent	Limited /	
Supply	Housing		objections		Moderate	
	11. Revised	Advanced	More significant	Consistent	Limited /	
	Village Envelope		objections		Moderate	
The character of the	1. Settlement	Advanced	Limited and	Consistent	Moderate-	
site and its	pattern etc		largely resolved			
surroundings	6. Landscaping	Advanced	Limited and	Consistent	Moderate-	
			largely resolved			
	17. Landscape	Advanced	Limited and	Consistent	Moderate-	
	Features		largely resolved			

<sup>&</sup>lt;sup>28</sup> https://consultation.dorsetcouncil.gov.uk/spatial-planning/alderholt-np/user\_uploads/alderholt-np-basic-conditions-statement-240329-v2.pdf

Issue	ANP policy	48(a) stage	48(b) objections	48(c) NPPF	Proposed weight	
The relationship of	8. The Village	Advanced	More significant	Consistent	Limited /	
the development to	"High Street"		objections		Moderate	
Alderholt and other	10. Local Needs	Advanced	Limited and	Consistent	Moderate-	
settlements and	– Employment		largely resolved			
their facilities	16. Local Green	Advanced	Limited and	Consistent	Moderate-	
	Spaces		largely resolved			

# **Prematurity Considerations**

- 4.71 National Planning Policy (paragraphs 49 and 50 of the NPPF) sets out when it may be justified to refuse a planning permission on the grounds of prematurity. This is summarised below:
  - the emerging plan must be at an advanced stage, in the case of a neighbourhood plan this usually means it will have concluded the local planning authority publicity period on the draft plan (i.e. the Regulation 16 consultation); and
  - the proposal must be so substantial, or its cumulative effect would be so significant,
     that to grant permission would undermine / prejudice the plan-making process by
     predetermining decisions about the scale, location or phasing of new development
     that are central to an emerging plan.
- The ANP has clearly reached an advanced stage in that the publicity period on the draft plan will have concluded on 25 June 2024. It is also evident that a development of this scale, which exceeds the Neighbourhood Plan housing target nearly ninefold, introduces a local centre away from the area identified in the Neighbourhood Plan, and allocates completely different sites to those being promoted in the Plan, would undermine the planmaking process by predetermining the amount, type and distribution of development in the area.
- 4.73 Having reviewed a number of appeal decisions where the issue of prematurity has been discussed, there are none that are directly comparable to this case. The only appeal decision that I have located where the issue of prematurity was raised and the NP at a similar stage, dates from October 2020 (APP/Q3630/W/20/3253944) and is included in

Appendix A16. Paragraphs 5 - 8 and 26 include the main points on this matter. In this case, the Inspector takes into account the Neighbourhood Plan's objectives and policies, including the housing target of at least 74 dwellings, and its stance on the appeal site (which differed from the appellant's proposals for the site, with the Neighbourhood Plan allocating the appeal site for 24 dwellings and public amenity space in its policy TH2(i), whereas the appellant was proposing up to 83 dwellings). The Inspector's view was that "the scale of the proposal and the conflict with Policy TH2(i), the proposal would be so substantial, and its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions."

## Conclusions in Issue 2

- 4.74 The Inspector has brought a number of related matters under this issue to help consider whether the development would be appropriate in this location. In my professional opinion, having reviewed the evidence, the answer, on all of the factors considered taken in turn, is "no, it is not appropriate". I summarise briefly below the main points that lead me to this conclusion:
  - The development clearly conflicts with the spatial strategy it is of a significant scale wholly out of proportion to the size of the village and its place in the hierarchy, and has not benefitted from the forward planning associated with the new neighbourhoods proposed at the higher tier settlements<sup>29</sup>. The spatial strategy is broadly consistent with the NPPF, is not overly restrictive (taking into account how it was applied by Dorset Council and the Planning Inspector as reported in another appeal decision also outside of the village envelope), and still of relevance in achieving sustainable development;
  - The scale of this development will have a notable impact on the character of the
    village and its surrounds, which in my opinion will be harmful; with the built-up area
    increasing by approximately 60%, areas of comparably high density development, a
    change to the character of Ringwood and Hillbury Roads and their relationship with

<sup>&</sup>lt;sup>29</sup> This is very evident from what could, at best, be described as an evolving application, with the Appellant providing new or updated evidence and suggesting further changes both during the application and at a very late stage in the Appeal process.

the countryside (as experienced by users of those roads), more traffic on the wider rural roads, more activity in the remaining countryside immediately adjoining the village, and a shift in the functional centre of the village away from its historic focus along the B<sub>3</sub>078 Daggons Road / Station Road, which is and always has been the historic focus of these activities;

- The contention that this scale of development will notably improve the employment prospects for the village and the provision of local facilities is not borne out by the evidence. Not only is there significant uncertainty over their delivery (linked to the poor forward planning for this proposal), but the benefits are limited the main one being a new health centre linked to one of the existing nearby practices that already serve this area. The lack of clarity on the education provision, particularly at First School and also pre-school provision, is a further concern.
- The development is likely to lead to considerable levels of out-of-village movements for access to a wide range of services and facilities. It fails to offer a genuine choice of transport modes, and the public transport benefits (including the proposed dedicated bus service) are highly unlikely to make any notable difference to the traffic levels.
- The scale and location of the development clearly conflict with key policies in the
  emerging Neighbourhood Plan, which by the start of the Inquiry will be at an
  advanced stage. The decision to approve this development would, in my opinion, be
  so substantial that to grant permission would undermine the plan-making process
  through predetermination.

# 5. S106 LEGAL AGREEMENT / PROPOSED CONDITIONS

There are no drafts (other than the headings in the SoCG) on the conditions or S106 agreement yet available for scrutiny and comment, and these are proposed to be provided by 11 June 2024. The Parish Council reserves the right to comment on these in terms of their suitability and potential omissions.

## 6. THE PLANNING BALANCE

- The starting point to the decision on the Appeal is based on whether the proposal accords 6.1 with the development plan (read as a whole), followed by considering whether there are material considerations that would indicate that a different decision should be made. Whilst a number of policy conflicts identified in the reasons for refusal are capable of being resolved, a fundamental conflict that remains is that the scale and location of the development is contrary to the settlement hierarchy and related housing provision distribution (Policies CEDLP KS2 and KS4) and the transport strategy (Policy CEDLP KS9), which together are intended to direct development to the most sustainable locations. Furthermore, it has not been demonstrated that the scale and mix of the proposed development could be developed in a manner appropriate to the landscape and rural character of the area (Policy CEDLP HE3 and CEDLP PC4), nor has it been demonstrated that there would not be an unacceptable impact on highways safety, or that the residual cumulative impacts on the road network would not be severe (Policy CEDLP KS11). A further fundamental point that remains unresolved at this stage is whether the adverse impacts on the European wildlife sites can be appropriate avoided through mitigation (Policies CEDLP ME1 and ME2)
- The conflicts with the development plan policies are part of the balancing exercise, with the weight accorded to this a matter of planning judgement. Subject to the adverse impacts on the European wildlife sites being resolved, it is accepted that the tilted balance would be engaged under NPPF paragraph 11(d)(ii). If this has not been resolved, then it becomes a decisive matter on which the application should be refused (as it has not been demonstrated that there are no alternative solutions, that there are imperative reasons of over-riding public interest for this development, and whether and what compensatory measures are necessary and whether these can be secured). The consequence of using the tilted balance is that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

- 6.3 I have identified the following matters that are relevant to the planning balance, and briefly comment on each in turn in light of my professional opinion, taking into account Dorset Council's and the Appellant's stated position in their SoC.
  - Housing including affordable housing and care provision;
  - Local employment / economic benefits;
  - Provision of a new local centre, services and facilities including healthcare and education;
  - Public transport benefits (including the proposed dedicated bus service);
  - Impacts on highway network (taking into account the potential highway improvements);
  - Spatial strategy / sustainability of location
  - Impacts on local character (including landscape character);
  - Impacts on the National Landscape
  - Impact on European Habitats Sites
  - Biodiversity Net Gain including SANG / Green Infrastructure;
  - Public open space (other)
  - Loss of best and most versatile agricultural land
  - Flood risk and drainage strategy
  - Energy strategy / solar array
  - Prematurity in relation to the Alderholt Neighbourhood Plan
- In coming to my view on these issues, I have taken into account proposed mitigation (as far as this is known) and the degree to which this is expected to resolve issues. I have also endeavoured to avoid 'double counting' matters. For example, I have dealt with the conflict with the Local Plan and emerging Neighbourhood Plan within the topics, and as such do not have conflict with these plans as a harm in its own right. I do however deal with the issue of prematurity which I consider to be a separate matter.

# Housing – including affordable housing and care provision

The shortfall in the strategic housing land supply for the area is at least 1.1years (3.9 year's supply vs 5 years' requirement). There is also a significant level of affordable housing need across Dorset, with over 5,000 households on the Dorset Council register (May 2024), as

well as a large shortage in specialist accommodation for older people. This would suggest that very significant weight should be accorded to the benefit of housing provision, taking into account the Government's objective of significantly boosting the supply of homes and ensuring that the size, type and tenure of housing meets the needs of the different groups in the community. Set against this starting point, are several factors:

- the healthy housing land supply within Alderholt with regard to its local needs, and
   Government policy that, in rural areas, planning decisions should be responsive to
   local circumstances and support housing developments that reflect local needs;
- the positive actions being taken by Dorset Council to address the wider shortfall;
- the lack of certainty regarding the speed of delivery from the proposed development, given the lead-in times associated with outline nature of the application, phasing and likely need for prior minerals extraction.
- The above factors in my opinion should reduce the weight to be given to these benefits. I would therefore attribute significant weight collectively to this benefit.
- I have also considered the fact that the provision of housing outside of the proposed revised village envelope is contrary to Policies 7 and 11 of the ANP, but such a conflict can only be given limited to moderate weight at this time, and does not alter the above conclusion.

  This is likely to alter as the ANP makes further progress.
- 6.8 With regard to the reduced level of affordable housing provision (relevant to Policy CEDLP LN3) due to viability issues, I am assuming that the main parties will be able to satisfactorily resolve this matter to ensure that the maximum amount of affordable housing that can reasonably be expected will be delivered. Should this not be the case, then the weight should be moderated further.

# Local employment / economic benefits

The provision of additional employment both in the short-term (as part of the construction phase) and long-term (through the provision of the employment area and local centre, and the increased potential for local expenditure from the larger population base) would clearly benefit the local economy and workforce, helping to create conditions in which businesses can invest, expand and adapt in line with NPPF paragraphs 85 and 88(a).

- 6.10 However, my evidence indicates that the quantum of development is unlikely to be sufficient for the increase in workforce (therefore representing a net loss), and furthermore there are concerns regarding its delivery based on market evidence, as the area's poor transport links mean that it may be difficult to attract inward investment, and that take-up will depend on locally-driven business needs that are more likely to be smaller enterprises. As with housing, there is also a lack of certainty regarding the speed of delivery given the lead-in times associated with the outline nature of the application, phasing and likely need for prior minerals extraction.
- The above factors suggest that the weight to be given to these benefits should be reduced.

  I would therefore attribute moderate weight to this benefit. I note that should this

  Appeal be dismissed, the creation of further employment space on land adjoining the village would nonetheless be possible under existing policy.
- I have also considered whether there is a conflict in relation to the provision of employment space outside of the proposed revised village envelope with reference to ANP Policy 10.

  The policy does not in principle resist development in such locations provided that it meets certain criteria, and in relation to this appeal these relate more to the impact on the rural character of the area. As such I deal with this potential policy conflict under the section on impacts on local character (and have not applied any weighting on this point here).

Provision of a new local centre, services and facilities – including healthcare and education

Whilst the provision of additional local services and facilities would generally be considered beneficial in terms of increasing the sustainability of a settlement through greater self-containment (and in principle is supported by Policies CEDLP KS2, LN7 and PC5), there is little evidence to justify that this would be delivered as envisaged and or that it would make the settlement more self-contained. There would be conflict with policy LN7 should the delivery of the school or healthcare provision be delayed – and therefore it will be necessary to ensure the timely delivery of these facilities to avoid any short-term harm (which I have assumed to be the case but this will be a matter for the S106 / planning conditions). The policy also expresses a preference for new facilities to be clustered – and whilst a local centre would achieve this to a degree, the nature of the development means that there are limited opportunities to consider co-location other than with the sports / social grounds.

- There is evidence of a willingness to provide GP services within the village from both local practices should the need arise, and that a new branch surgery is unlikely to be justified without significant growth. At the time of drafting this proof, it was envisaged that this would form part of the local centre, but there was no detail regarding exactly what, how or when this would be secured and whether the provision would be sufficient to meet local needs in a reasonable timescale. It is assumed that this detail will be provided as part of the S106 / conditions, and demonstrates the timing of delivery in relation to anticipated increased needs, particularly as the Phasing Plan suggests that the local centre would not be built until Phase 4 of the development.
- There is no evidence of any clear, tangible benefits from the additional community building, other than mitigating the impact of the additional population on the capacity of the existing facilities.
- There is no credible evidence to demonstrate that a larger food convenience store could be attracted to this location, wherever the local centre is located within the development. Should such a store be delivered in this location, the retail impact assessment acknowledges that there is a possibility that this would result in the loss of the existing convenience store, given the projected and significant short-term deficit in revenue that would result<sup>30</sup>. This would be an indirect adverse impact from the development, but not strictly contrary to Policy CEDLP PC5 given that alternative provision in the local centre would not result in the loss of this service to the village. It is not clear whether the same applies to the Churchill Arms public house (as the assessment does not factor in the existing pub in the village but only the impact on such provision in Fordingbridge and Verwood).
- 6.17 The issue of school provision will be resolved in time (given Dorset Council's statutory to ensure that there are sufficient schools in their local area to provide primary and secondary education appropriate for pupils' ages, abilities and aptitudes) but there are outstanding issues regarding how this is achieved and in what timescales. Based on the evidence for this Appeal at this point, it would appear that on-site expansion of St James First School places would, at the least, necessitate the provision of playing fields off-site, resulting in a

<sup>&</sup>lt;sup>30</sup> See paragraphs 5.53 - 5.64 of Retail Impact and Sequential Test Assessments C10327, DPDS Consulting, November 2023

less favourable offer. In another appeal case from Chilcompton, Somerset<sup>31</sup>, where the village primary school expansion plans remained uncertain at the time of the decision, the Inspector described this as "a deeply unsatisfactory position for the inquiry where the sustainability credentials of [that settlement] are a critical issue" and considered the lack of a solution for providing sufficient school places at that point to be a significant adverse impact of the scheme (the appeal decision is provided in Appendix A<sub>17</sub>). The lack of evidence regarding pre-school provision and childcare is also a concern, including provision outside of term time, and whilst this could come forward as part of the development (within the range of Class E uses in the Local Centre) there are no clear plans to allow for this or consideration of their space requirements.

- 6.18 Based on these points, the potential benefits of improved access to local healthcare which clearly weight in favour of the scheme are, in my opinion, negated by the issues relating to education. The potential provision of the other services and facilities are uncertain or neutral in their impact, and on that basis I would attribute very limited (negligible) weight to this matter overall.
- I have also considered whether there is a policy conflict in relation to the provision of these facilities and potential impact on the viability of existing facilities in relation to the emerging policies of the ANP. Most relevant is Policy 8 The Village "High Street". The proposed development would undermine the aim clear aim of this policy, which is to reinforce the sense of a village centre/high street in this location, and as such there is a clear conflict. Whilst at this stage I only give this policy limited to moderate weight, I consider that it does tip my conclusions on this issue into one of attributing overall harm, albeit limited.

Public transport benefits (including the proposed dedicated bus service)

6.20 The provision of what I understand to be a half hourly bus service (peak) and hourly service (off-peak) guaranteed to run for 7+1 years is clearly an improvement on the existing lack of provision. The evidence provided by the Appellant<sup>32</sup> includes a suggested timetable, but does not clarify whether this would cover weekend services, and as such the previous 2-

<sup>&</sup>lt;sup>31</sup> Appeal Decision APP/Q3305/W/21/3280802 at [42] and the Inspector's conclusion at [62]

<sup>&</sup>lt;sup>32</sup> in Appendix D of the TA addendum and Figure 11 (page 40) of the TA

hourly timetable covering weekends (albeit only Saturdays) in the original TA has been assumed for the purpose of this assessment. This creates the following profile for journey links. No other higher order settlements are proposed to be directly served.

Figure 6. Profile for bus journey options

To / from:	Cranborne			Fordingbridge			Ringwood			
Day	M-F	Sat	Sun	M-F	Sat	Sun	M-F	Sat	Sun	
Frequency	30min	2hr		30min	2hr		30min	2hr		
	– 1hr			– 1hr			– 1hr			
Morning departures	07:00	08:48		07:35	07:15		07:35	07:15		
(out of Alderholt)										
Arrival at destination	07:12	08:57		07:50	07:27		08:10	07:47		
Evening departures	20:15	19:00		19:35	18:30		19:15	18:20		
(out from destination)										
Arrival in Alderholt	20:25	19:09		19:50	18:42		19:50	18:42		

- 6.21 The provision of a service along these lines has a number of drawbacks. These include:
  - the limited destinations served (Mark Baker's proof covers onward journeys via other services and the impracticality of these);
  - the limited evening coverage (with social and leisure activities having to conclude early in order to catch the bus home – for example, a trip to the Regal cinema in Fordingbridge would not be possible as films generally commence at 7pm);
  - the lack of service provision on Sundays and less frequent service on Saturdays and inter-peak;
  - the fact that access to after-school clubs and activities for those attending the
     Upper School in Wimborne will be reliant on the parent's ability to collect the child
     by car (as the suggested service does not link to Wimborne); and
  - the uncertainty regarding ongoing provision of a commercially viable service and prospects of future cuts or withdrawal as a result.
- 6.22 Having regard to these factors, I would attribute limited weight to this benefit. This may change should further clarity on, and improvements to, the service be made through the S106 agreement.

Impacts on highway network (taking into account the potential highway improvements)

- Mark Baker's proof of evidence highlights a range of concerns regarding the robustness of the Appellant's Transport Assessment, that means that the development impact is likely to be underreported. He also refers to the character of the various local roads as covered in the proof of evidence of Action for Alderholt. His concerns reflect the concerns raised initially by Dorset Council and set out in RfR7 insofar as it is simply not possible to correctly identify the highways impacts arising from the proposal and ensure that these can be adequately mitigated. Furthermore, even without certainty on the extent of highway impacts, it is clear that a large proportion of trips will be external, car-based and medium to long distance, on roads that do not form part of the Prime Transport Corridors. He concludes that the proposed development simply and manifestly fails all three tests contained within NPPF paragraph 114, and in addition paragraphs 115 and 116.
- Having regard to these factors, I concur with Dorset Councils assessment of weight in their Statement of Case, and would attribute significant weight to this harm.

# Spatial strategy / sustainability of location

of growth proposed. In this respect there is a clear conflict with the spatial strategy (in particular Policies CEDLP KS2, KS4 and KS9),. The spatial strategy remains relevant, and reflects national planning policy. The proposed development seeks to focus development in an area of comparatively low demand for housing and employment, is unlikely to result in a higher degree of self-containment, undermines the effective and efficient provision of services and focused infrastructure investment, and will result in a higher number of carbased trips to higher order settlements as a result, with associated adverse impacts. Under this issue I include climate change impacts given that, until such time that all vehicles are genuinely zero-carbon, the traffic arising from the development will generate Co2 emissions, which would not be the case if directed to a more sustainable location where shorter trips could be made. I would therefore agree with Dorset Council's assessment in their SoC and attribute very significant weight to this harm.

# *Impacts on local character (including landscape character)*

- 6.26 Whilst matters of scale, layout, landscaping and appearance are not fixed at this stage, and impact on local character was not identified as a reason for refusal, it is evident that the scale and location of development will alter the character of the village and its surrounds.
- Policy CEDLP HE3 indicates that the decision-maker must be satisfied that the proposals have taken the character of the settlement and its landscape setting into account, and CEDLP HE2 requires development to be compatible with or improve its surroundings.
- The change in character is likely to be harmful for the reasons outlined in my evidence, in particular how the historic centre of the village will become more peripheral (both physically and functionally), the changes to the rural character of the lower parts of Hillbury and Ringwood Roads (as currently appreciated by a range of users), and the changing character of the immediate countryside (as a result of the greater use and management of the proposed SANGs). This does not appear to me to be an unreasonable position, given that in the Chilcompton case (Appendix A18, and context map provided in Appendix A19) where an extension of 95 homes to a village of about 800 dwellings was considered to be "out of scale in relation to the smaller estates in the main core of the village", and it was acknowledged that the "proposed change from open pasture to residential housing estate would fundamentally change the rural character of the site".
- 6.29 Whilst the immediate countryside is not a valued landscape, both the CEDLP and national policy still expect development to be sympathetic to local character and history, including the surrounding built environment and landscape setting, and to recognise the intrinsic character and beauty of the countryside. I would therefore attribute moderate weight to this harm.
- 6.30 Policies in the emerging ANP reflect some of these points in particular the relationship between the village and countryside but tend to be more focused on detailed design matters. Whilst I would accord these moderate weight at this stage, and it is a matter of concern that the indicative Masterplan has not been updated to consider their implications and demonstrated that these can be achieved, I do not consider this fundamentally alters the overall weight that I have attributed to this matter at this stage of the ANP.

# Impacts on the National Landscape

6.31 In considering the impacts on the Cranborne Chase National Landscape, the Parish Council wish to defer to Dorset Council's expertise on this matter, and I have adopted Dorset Council's assessment in their SoC and attribute moderate weight to this harm, but note that this may change subject to further evidence on this matter.

# Impact on European Habitats Sites

In considering the impacts on the European Habitats, the Parish Council wish to defer to Dorset Council's expertise on this matter. I have adopted Dorset Council's assessment in their SoC and recognise that this is a Decisive Issue given the absence of evidence to demonstrate that the legal requirements in relation to the protection of these sites has been met. Should evidence be forthcoming that the adverse effects on the site's integrity can be satisfactorily mitigated, then there may be a limited degree of harm or some benefit not already accounted for that should go into the planning balance.

# Biodiversity Net Gain including SANG provision

In considering the biodiversity net gain and SANG heathland mitigation, the Parish Council defers to Dorset Council's expertise on these matters. I note the appellant's contention that the level of gain exceeds the now introduced statutory requirement of 10% - achieving a 10.74% net gain in relation to hedgerow units, a 13.16% net gain in relation to habitat units and a 69.80% net gain in relation to habitat units (all of which will be subject to the agreement of the relevant mitigation and enhancement strategies), and that the Council's Heathland Mitigation Coordinator is largely satisfied with the proposed SANG provision (subject to detailed matters on future management and monitoring), and also the wider multifunctional / recreational benefits of this network, and I have adopted Dorset Council's assessment in their SoC and attribute significant weight collectively to this benefit.

# Public open space (other)

6.34 The land use budget includes 19.1ha of green / blue infrastructure in addition to the SANG provision, and there is some detail on how this is intended to be used in the committee report to achieve the standards relevant to Policy CEDLP HE4. This could deliver an

extension to the Alderholt recreation ground (potentially providing 2 on-site football pitches and a tennis centre), additional allotments (about 1.0ha), as well as range of play spaces, active sports space, and amenity greenspace. This replaces existing countryside which is valued by local residents, and is primarily intended to mitigate the adverse impacts of the increased population on existing provision and will provide only limited additional benefit as, for example, the local play areas will be within the new housing areas, and the play facilities elsewhere within the village meet existing local needs to a large extent. On this basis, I would attribute limited weight to these benefits.

# Loss of best and most versatile agricultural land

- 6.35 Although not a reason for refusal, the potential loss of best and most versatile (BMV) agricultural land is relevant in the planning balance, and something that cannot be mitigated through a condition or planning obligation.
- An agricultural land appraisal has not been submitted as part of the application, but the Environmental Statement refers to the site being Grade 3 farmland. The provisional Agricultural Land Classification Grade Map (as digitised from the published 1:250,000 map) indicates the area is Grade 3, and more recent (post 1988) classification of land to the east side of Hillbury Road shows a mix of Grades 3a and 3b land in that location, with some Grade 2 in the wider vicinity (Appendix A18). Whilst it is not possible to quantify the extent of loss of some of the best and most versatile agricultural land (given the lack of detailed evidence), taking a precautionary principle this could amount to a loss of 41.9 hectares of productive farmland<sup>33</sup>.
- 6.37 NPPF paragraph 180(b) and footnote 62 makes clear that planning decisions should recognise the benefits of the best and most versatile agricultural land and direct development to areas of poorer quality. This would include both its contribution to food production and its role as a carbon sink.
- 6.38 Whilst it is reasonable to assume that given the shortfall in housing, some agricultural land will have to be developed in order to meet housing needs, there is no evidence to show that

<sup>&</sup>lt;sup>33</sup> This calculation is based on the proposed extent of the neighbourhood, employment and local centre areas and excluding those areas used for SANG, green corridors, the solar array, and recreation as provided in the Appellant's Land Use Budget

this has been minimised and alternative sites of poorer quality prioritised. The loss of less than 40ha of BMV land has been deemed to be a significant material harm on other appeal decisions that I am familiar with. I would therefore attribute at least moderate weight to this harm. Should evidence be forthcoming on the actual extent and grade of farmland that will be lost, then this may be revised.

# Flood risk and drainage strategy

6.39 With regard to flood risk, whilst I am aware of concerns that have been raised by parishioners, it is accepted that Dorset Council are satisfied that the risk can be mitigated subject to conditions, and the Parish Council defers to their expertise on this matter. I am not aware of any evidence demonstrating that the proposals would improve flood safety elsewhere. I have therefore considered this as having negligible influence on the planning balance.

# Energy strategy / solar array

The late submission of an Energy Strategy including a possible solar farm outside of site boundary is noted, but it is uncertain whether this is deliverable as part of the current application, for the reasons outlined by Dorset Council in their SoC. I have adopted Dorset Council's assessment in their SoC and attribute limited weight to the benefit of the solar array included within the original planning application.

# Prematurity in relation to the Alderholt Neighbourhood Plan

- The proposed development clearly conflicts with the emerging Neighbourhood Plan, which is at an advanced stage. Whilst the three tests outline in NPPF paragraph 48 suggest that impact of this conflict should be moderated in light of the unresolved objections, the issue of prematurity is dealt with separately under paragraphs 49 and 50, and it is that issue which I now turn to consider.
- 6.42 Neighbourhood Plans are recognised as an important element of the plan-making process, they have the same legal status as a local plan (as part of the development plan), and as explained in the NPPG<sup>34</sup> give communities the power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. Given that the

<sup>&</sup>lt;sup>34</sup> Reference ID: 41-001-20190509 https://www.gov.uk/guidance/neighbourhood-planning--2

ANP will have concluded the local planning authority publicity period on the draft plan on 25 June 2024, prior to the determination of this Appeal, it is at an advanced stage and therefore fulfils the requirement of paragraph 49(b). It is my professional opinion that the proposal would be so substantial that to grant permission would undermine the planmaking process by predetermining decisions, and I have outlined the reasons for this in my evidence. On this basis, I would attribute significant weight to the harm on the grounds of prematurity.

# Conclusions on the Planning Balance

6.43 The above factors are summarised simplistically in the following table:

	Benefit <<				>> Harm				
Weight³5 →  ↓ Issue	Very Significant	Significant	Moderate	Limited	Negligible	Limited	Moderate	Significant	Very Significant
Housing – inc affordable & care provision		✓							
Local employment / economic benefits			✓						
Provision of local centre, services etc						✓			
Public transport benefits				✓					
Impacts on highway network								✓	
Spatial strategy / sustainable location									✓
Impacts on local character							✓		
Impacts on the National Landscape							✓		
Impact on European Habitats Sites									DI
Biodiversity Net Gain / SANG / GI		✓							
Public open space (other)				✓					
Loss of BMV agricultural land							✓		
Flood risk and drainage strategy					✓				
Energy strategy / solar array				✓					
Prematurity in relation to the ANP								✓	

DI = decisive issue under law

<sup>&</sup>lt;sup>35</sup> It is noted that the various terms used for the weight accorded to issues tends to vary and there is no agreed definition of these in national policy. For the purpose of this appeal, I have used the term very significant weight to be broadly synonymous with substantial weight, and the term significant weight to be broadly synonymous with great weight.

- Turning to other considerations, whilst there may be potential adverse impacts arising from matters such as residential amenity, it is assumed that these can and will be addressed as part of the detailed design requirements and as such are not matters to which I would attribute any weight in the planning balance. The weight relating to issues such as archaeology, trees, mineral safeguarding, and public rights of way are also capable of being suitably conditioned and likely to have negligible / limited impact, and I have similarly excluded these as they are unlikely to result in any notable shift in the planning balance. I have taken into account the points made by both Dorset Council and the Appellant in their respective SoC and there are no other matters that I consider would make a material difference.
- It is my professional opinion that, notwithstanding the benefits that would accrue from the proposal, the adverse impacts of the scheme would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole. The proposal would not therefore be sustainable development. This is based on applying the 'tilted balance' on the assumption that the adverse effects on the European wildlife site's integrity can be satisfactorily mitigated.
- 6.46 Respectfully, the Inspector is asked to dismiss this appeal.

**TOWN AND COUNTRY PLANNING ACT 1990** 

PLANNING AND COMPULSORY PURCHASE ACT 2004

**SECTION 78 APPEAL** 

BY DUDSBURY HOMES (SOUTHERN) LTD

REGARDING: MIXED USE DEVELOPMENT OF UP TO 1,700 DWELLINGS INCLUDING
AFFORDABLE HOUSING AND CARE PROVISION; 10,000 SQM OF EMPLOYMENT SPACE IN
THE FORM OF A BUSINESS PARK; VILLAGE CENTRE WITH ASSOCIATED RETAIL,
COMMERCIAL, COMMUNITY AND HEALTH FACILITIES; OPEN SPACE INCLUDING THE
PROVISION OF SUITABLE ALTERNATIVE NATURAL GREEN SPACE (SANG); BIODIVERSITY
ENHANCEMENTS; SOLAR ARRAY, AND NEW ROADS, ACCESS ARRANGEMENTS AND
ASSOCIATED INFRASTRUCTURE (OUTLINE APPLICATION WITH ALL MATTERS RESERVED
APART FROM ACCESS OFF HILLBURY ROAD)

AT: LAND TO THE SOUTH OF RINGWOOD ROAD, ALDERHOLT

**PROOF OF EVIDENCE - APPENDICES** 

Of

JO WITHERDEN BSc(Hons) DipTP DipUD MRTPI

ON BEHALF OF

ALDERHOLT PARISH COUNCIL

May 2024

PLANNING INSPECTORATE REFERENCE: APP/D1265/W/23/3336518

LOCAL PLANNING AUTHORITY REFERENCE: P/OUT/2023/01166

# Appendix A1. Appellant Options Stage and Regulation 14 Consultation Stage Responses

# **Options Consultation Stage**

Alderholt Neighbourhood Plan - Options Questionnaire

# #1

#### COMPLETE

Collector: Web Link 2 (Web Link)

Started: Monday, July 31, 2023 5:39:01 PM

## Q1

Our vision is to ensure that Alderholt remains a village with the essential amenities and facilities that enables residents and visitors to enjoy the beautiful countryside whilst being part of an active and friendly community in a peaceful rural setting. Do you broadly agree with the VISION - how many thumbs up would you give it?

#### 

You can add any comments here about what you think we have missed or got wrong.:

# Okay

Dudsbury Homes supports the aspirations of the local community to produce a Neighbourhood Plan for Alderholt and to set out a strategy for the sustainability of the village. It is essential however that this vision is deliverable and is supported by robust evidence that it can be achieved. Whilst acknowledging that this is an early stage consultation, Dudsbury Homes is concerned that there appears to be very little evidence to suppirt the emerging plan strategy or identification of development sites. Failure to adequately evidence the plan strategy is likely to result in an unsustainable future for the village and an unsound plan. All Neighbourhood Plans must meet the basic conditions set out in national guidance, in summary: 1. If a NP is being produced, it should follow SoS Guidance 2. If housing numbers are being proposed, those numbers should come from LPA latest advice, be up to date and not based on previous targets. 3. If sites are being allocated, they should follow the methodology and viability guidance (more detail below and methodology attached) 4. If Infrastructure is beingproposed then basic information is required; a. what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way b. how any additional infrastructure requirements might be delivered c. what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery d. what are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices It is considered essential that much more detail is required in the plan to demonstrate that the basic conditions can be met and that the vision of delivering sustainable development to sustain Alderholt can be delivered.

#### Q2

Do you broadly agree with the following objectives...

Protect and retain the character of the village – its uniqueness on the edge of Dorset, its compact form and quiet nature, its links to the former railway, historic buildings and the surrounding countryside

Yes

Yes

Reinforce the sense of a village centre/high street

Yes

Protect and strengthen the highly valued amenities and community facilities that provide its residents with a strong sense of connection and community, allowing them and newcomers to be active, develop and thrive

Identify suitable sites for the level of development required to meet the anticipated need for housing, as well as providing opportunities for some local employment, that would be compatible with the nature of our village and limited road access

Yes

Ensure there are safe and attractive walking and cycling routes around the village, and support the project to re-use the former railway for recreation and onward connection to Fordingbridge

Yes

Protect the intrinsic beauty and enjoyment of the countryside and approaches to Alderholt

Yes

Protect and strengthen the more isolated settlements – Cripplestyle, Daggons and Crendell and the wider countryside - from inappropriate development ensuring its rural nature and the extensive biodiversity of our parish is enhanced

Yes

You can add any comments here about what you think we have missed or got wrong.:

The objectives are supported, however there is a clear dichotomy between the level of development suggested and the aim of maintaining facilities and services in the village. Therefore, the vision and objectives cannot be achieved without a greater degree of growth to ensure the village can become more self-sustaining e.g. how does the plan seek to reinforce a village centre/high street when there isn't one and where the opportunity within the existing village doesn't currently exist.

## Q3

Alderholt site options Please select up to 3 options as 'most suitable'Otherwise choose suitable or not suitable. If you don't know the site then tick 'don't know' for that row

You can add any comments about the sites here – please include the reference number:

It is unclear how these sites have been selected, nor how the suggested capacity of each site has been assessed. No technical evidence has been advanced to support this part of the consultation. It is considered that the levels of development proposed will merely perpetuate the continued decline in facilities and services in the village, as has been the case with recent developments which have contributed nothing toward sustaining the village. A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic

conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development. While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order. A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body. Further details are set out in guidance of the type of evidence useful in supporting a local plan. Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need. In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making. A neighbourhood plan can allocate sites for development, including housing. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. Guidance on assessing sites (methodology flowchart attached) and on viability is available. From the very limited information set out in the consultation it is clear that the basic conditions set out above have not been met. Whilst the emerging Dorset Plan refers to 192 dwellings requirement in Alderholt, this has not been tested, and equally, the plan also refers to options for larger quantums of development which are not even referred to in this consultation. Also, if they intend to deliver housing. there is no mention of the need to provide SANG. Small sites wont be able to accommodate it so where is it going to be provided and how. Can the sites deliver nutrient neutrality and BNG? Site 020 Blackwater House is unlikely to be supported by NE. It is on the bridleway to Cranborne Common and can not provide on-site SANG and they note the access to the bridleway as a positive. This just emphasises the lack of understanding on deliverability within the survey.

#### Q4

Do you think any of the sites that were rejected at the first stage should be considered (in preference to those above)?

Yes - please note the reference number of the site and any comments about why it would be more suitable here::

This assessment is not comprehensive and again appears to lack any evidence to support it. Once again it fails the tests of the basic conditions referred to earlier.

#### Page 3

### Q5

Local Green Spaces In order to be designated as a Local Green Space, such spaces must be clearly valued by the community and of obvious importance for their recreational, landscape, historic, cultural or wildlife value. They cannot be extensive tracts of countryside, or land which may have planning permission for development or likely to be needed for development in the foreseeable future. Local Green Spaces are not necessarily public open space, and their designation does not give any additional public rights of access to these areas. If these spaces are to be designated we will also need to consult the landowners to consider what they may have to say about the designation. Which of the following green spaces do you consider to be important?

#### Respondent skipped this question

#### Q6

Alderholt ViewsWhilst we all appreciate the intrinsic beauty of the countryside, some views and vistas may stand out as particularly special. Which of the follow views do you think are particularly important and should be specifically protected?

Please describe any important views that you think we have missed (if at all possible please say where you are standing when you see the view - either the name of the place or grid reference - and approximately what direction you are looking). NB views must be from publicly accessible places, such as the public footpath network.

There appears to be no methodology or reasoning set out to support the selection of these views. They appear rather random with some being quite small local views while others are views of the countryside well beyond the village. Equally, there is no obvious link between the views selected and the sites selected or rejected earlier. A much more robust Landscape and Visual Impact Assessment is required to support the plan.

## Q7

If you have a photo of a view that you would like to be considered, you can upload it here

Respondent skipped this question

## Page 4

#### Q8

Please indicate which of the housing styles and layouts you think would be appropriate for Alderholt - you can tick as many or as few as you like.

## Respondent skipped this question

## Q9

If you can and would like to spend a little more time giving us your feedback on the good and bad aspects of these designs (a further 7 questions, one on each of the above styles of development), please click 'yes'

## No

#### Page 5

#### Q10

Respondent skipped this question

Photo 1What do you like about this? What don't you like about this?

#### Q11

Respondent skipped this question

Photo 2What do you like about this? What don't you like about this?

#### Q12

Respondent skipped this question

Photo 3What do you like about this? What don't you like about this?

Q13

Respondent skipped this question

Photo 4What do you like about this? What don't you like about this?

Q14

Respondent skipped this question

Photo 5What do you like about this? What don't you like about this?

Q15

Respondent skipped this question

Photo 6What do you like about this? What don't you like about this?

Q16

Respondent skipped this question

Photo 7What do you like about this? What don't you like about this?

## Page 6

#### Q17

The following points have been identified by the Neighbourhood Plan group as features that they think would be important factors in the design of new development. We would like to check whether you agree. Please tick as many as you agree with.

Retain and strengthen the number of mature trees (particularly oaks) along the roads

Have space between and around homes to allow some greenery / planting

All new homes should be eco-friendly,

Affordability is important - both in terms of size, materials and running / home maintenance costs

#### Q18

Please tell us which of the following design elements you think are the most and least important for future development in Alderholt? Please select one option as the most important, and one as the least important.

Rural character

Most important

Beautiful designs - unique architecture and detailing

Least important

#### Q19

#### Moderately important

There are very few buildings in the village that date back more than 100 years. Over time, older buildings have been demolished and redeveloped - and unless a building is Listed, there are no planning rules that would prevent demolition. To what extent do you think we should identify the remaining older buildings and encourage their retention?

Page 7

Outside of the parish

In which part of the parish do you live?

#### Q21

Please tell us your name (or names if this is completed on behalf of a family). This is to help check how many people responded and avoid duplication - your names will not be published. If you feel strongly that you do not want to give this personal information, you can leave this question blank.

Simon Trueick, Intelligent Land on behalf of Dudsbury Homes. st@intel-land.com

#### Q23

If you have supplied any personal information (such as name or contact details) we need your consent to hold this. The personal information you have provided will be held and used by the Parish Council (and their working group / planning consultant) for research relating solely to the preparation of the neighbourhood and related planning policies for the area. It will not be used or published in a manner which would allow identification of your individual responses, or kept for more than 6 months following the completion of the Neighbourhood Plan.

Yes; I consent to you using the personal data provided on this form in the way described above.

#### 024

Thank you for completing this questionnaire. We will be consulting further as we progress, but if there is anything you want to raise now, please do so here. Then please submit your responses to us.

Dudsbury Homes would welcome the opportunity to engage fully with the Neighbourhood Plan. Dudsbury Homes holds options over a significant landholding in Alderholt and is a position to significantly support the Neighbourhood Plan and its vision for a sustainable village.

What is critical however is that any strategy for the village is both achievable and del9iverable. The development pattern of the last few decades in Alderholt, including recent developments which the consultation seeks to include, is of a drip feeding of more and more housing which never contributes to or sustains local services and facilities.

The result has been a slow decline in the village - reduced medical provision, shops closing, bus services minimised, school rolls depleted. The plan strategy apparent in this consultation simply seeks to repeat this unsustainable pattern in the future, with housing of a type and quantum which will again fail to sustain the village.

This approach fails the national basic conditions, and will result in an unsound plan. Worse, it will ultimately fail the aspirations of local people.

Dudsbury Homes would welcome a discussion on a new way forward for the village, and looks forward to further engagement with the Neighbourhood Plan Group.

## Regulation 14 Stage

Page 1: ALDERHOLT NEIGHBOURHOOD PLANPre-submission consultationDecember 2023 / January 2024

#### 01

Your interest in the Neighbourhood Plan

None of the above - but I have an interest in the plan area

Business / organisation (if applicable):

**Dudsbury Homes** 

#### Q2

Please note: we are asking for your name and contact details to help us have a clear audit trail of who responded on what issues, and so that we can contact you for further clarification if necessary. We will not publish your email or address. If you are responding as an individual, we do need permission under data protection laws to hold any identifying personal information for the purposes of finalising this Neighbourhood Development Plan – so if you do not give your permission please leave your details (below) blank. Your name and contact details:

Name: Simon Trueick

Email: st@intel-land.com

Address: Intelligent Land, Hillview Business Centre, 2 Leybourne

Avenue, Bournemouth BH10 6HF

#### Q3

The first 6 policies deal with general matters on design - please let us know whether you agree with them. You can expand on any comments by using the space at the very end if you need to.

Policy 1. Settlement pattern, layout and densities Comment:

#### Disagree

The Plan's overall approach to development and sustaining the village is flawed. There is clearly an aspiration to sustain local services and facilities, which it is acknowledged have declined over time. It is also an aspiration to secure employment in the village and to create a "high street" and a village centre. All are valid aspirations, however the level of growth proposed will not deliver these aspirations, and may actually contribute to further decline in services. The Dorset Local Plan has consulted on options for larger growth in Alderholt and Dudsbury Homes has submitted proposals which could deliver the Neighbourhood Plan aspirations and create a sustainable village. Regrettably there has been no attempt by the NP Group to engage with Dudsbury Homes in the preparation of this Neighbourhood Plan, even to discuss the basis of the Plan's aspirations and strategy. Progressing this Plan to adoption without major changes will simply set the Plan up to fail its local residents.

Policy 2. People-friendly streets and paths Comment:

#### Disagree

The Plan's strategy of establishing Daggons Lane as a "High Street" runs contrary to this policy aspiration. Daggons Lane is a main through route in the village, and is on the northern periphery of the community. Setting aside whether a High Street is viable at all given the limuted level of growth proposed in the Plan, Daggons Lane is a poor location for new services and will likely encourage more car trips even by local residents given the distance of the location from much of the housing in the village.

Policy 3. Parking Provision

Policy 4. Respecting local character in the design

Policy 5. Environmental performance and sustainability

Policy 6. Landscaping

Neither / not sure

Neither / not sure

#### Q4

Questions 7 - 11 focus on what development can happen and where

Policy 7. Meeting Local Needs - Housing

#### Disagree

The Plan essentially proposes "more of the same" yet acknowledges that development in the past has failed to deliver affordable housing and sustain local services. Just 50 new dwellings are proposed, split over 3 sites, two of which have an allocation only just above the national threshold for delivery of affordable housing. It is noted in the Appendix to the Plan that the 138 dwellings already committed in Alderholt are forecast to deliver just 7 affordable homes (5%), which suggests that the 50 dwellings allocated will be unlikely to deliver any affordable homes at all, let alone the 35% minimum aspiration. At least one of these sites is required to deliver employment on the same site, and all 3 have flood issues to address, again affecting future viability. The Plan strategy will therefore continue to deliver minimal housing which contributes little or nothing to the community. In short - the lessons of the past have not been learned.

Policy 8. The Village "High Street" Comment:

#### Disagree

This policy is totally unachievable and the location chosen is poor. As stated above, Daggons Lane is a busy through route and is on the northern periphery of the village. Additionally there is no development allocation along Daggons Lane which will facilitate the creation of a High Street or village centre. There appears to be a rather vain hope that infill development will create some sort of retail or commercial frontage, but as this cannot be forecast it is clear that this Policy has no evidential basis of delivery. Any infill which does occur is likely to be very small scale residential, probably single dwellings, which will not deliver a commercial element at all

Policy 9. The Trailway

Policy 10. Meeting Local Needs - Employment Comment:

Neither / not sure

#### Disagree

As above, the small level of employment proposed, coupled with the overall low level of growth, is very unlikely to be achieved.

Policy 11. Revised Village Envelope Comment:

#### Disagree

In line with the emerging Dorset Local Plan, the Neighbourhood Plan should have properly considered the potential of larger scale growth and revisions to the village which are capable of delivering sustainable development. It has not done so. There is a clear conflict therefore between the vision and objectives of the Plan to deliver services, facilities and employment, including a "High Street", and the minimal level of growth proposed.

#### Q5

Questions 12 - 14 are the main site allocations proposed in the PlanPlease note that any development on these sites would still require a planning application, but would be guided by the policy for the site (and the other general policies on design).

Policy 12. Alderholt Nursery, East of Ringwood Road

Policy 13. Paddock South of Daggons Road

Policy 14. Land south of Blackwater Grove

Neither / not sure

Neither / not sure

Neither / not sure

#### Q6

The final 14 policies deal with safeguarding valued features and facilities...

Policy 15. Safeguarding Local Facilities

#### Comment:

As above, whilst this policy is laudable in itself, continued low levels of growth in Alderholt have already seen a steady decline in local services. Trying to protect services whilst failing to permit the growth that they need to survive is a policy which will fail and impose unreasonable demands on business owners who are losing trade and custom through static population growth. Without susch sustained investment in growth, residents will continue to access services outside the village thus perpetuating decline. Contrary to para 4.1.20 of the Plan, the planning system can deliver these facilities if sufficient scale of growth is

allocated

Policy 16. Important Local Green Spaces

Policy 17. Key Landscape Features

Policy 18. Important Views

Policy 19. Non-designated Heritage Assets around Alderholt

Neither / not sure

Neither / not sure

Neither / not sure

Neither / not sure

### Page 3

#### Q7

The Plan includes three Projects, which set out some actions that were identified and will be taken forward by the Parish Council during the Plan's lifetime. Please can you indicate whether you think the projects are a good idea?

Trailway Project Neither / not sure Local Healthcare Outreach Project Neither / not sure Oak Tree Project Neither / not sure

## 08

To help us understand at this stage whether we have got the plan 'broadly right', please tick one of the following:

I would not support the plan as drafted, it needs major changes

Respondent skipped this question

If you have any comments on the draft Strategic Environmental and Habitats Regulations Assessments, you can comment here:

#### **Q10**

Please use the space below to add to or make any other comments about the Neighbourhood Plan, if you so wish:

Dudsbury Homes would again request the opportunity to engage with the NP Group and Parish Council on the development of the Neighbourhood Plan. Dudsbury Homes wishes to avoid the need to submit objections to the NP Examination on these issues where constructive dialogue is possible.

## Appendix A2. Affordable housing needs data, December 2022 and May 2024

From: [redacted]< <a href="mailto:[redacted]@dorsetcouncil.gov.uk">[redacted]@dorsetcouncil.gov.uk</a>

**Sent:** 12 December 2022 09:33

**To:** [redacted]

Subject: RE: Alderholt Neighbourhood Plan - Housing Target

Hello Ed

Below are the number of live applications on the Housing Register for people who have declared a connection to Alderholt, there are 18 of these and this broken down in more detail in the table below. There are a further 8 applications that have been submitted but not yet assessed and most of these will become live applications. I note this number is higher than the one quoted in the Housing Target document you sent over. This may be because we now have a new allocation policy with slightly different rules for people joining the register. I expect this will lead to an increase in most East Dorset areas, in total there are 3549 households on the housing register.

Count of Band	Bed need					
Alderholt	1	2	3	5	(blank)	Grand Total
Band A - Urgent Housing Need				1		1
Band B - High Housing Need	1	1	2			4
Band C - Medium Housing Need	2	2	2			6
Band D - Low Housing Need	4	1	2			7
(blank)						
Grand Total	7	4	6	1		18

If you need anything else please let me know.

Paul

[redacted]
Housing Enabling Team Leader
Housing
Dorset Council

01305 252447 dorsetcouncil.gov.uk



From: housingenabling < housingenabling@dorsetcouncil.gov.uk>

**Sent:** Monday, May 20, 2024 8:41 AM

To: [redacted]
Cc: [redacted]

Subject: RE: Alderholt Affordable Housing Needs

Good morning Jo,

The current housing need for Alderholt is listed below.

Submitted Online means applications that are still being processed so do not yet have a housing band – some of these will not progress due to lack of information/change in circumstances.

The Preferred Area numbers are in addition to those with a local area connection.

Alderholt - Local Connection hous	sing need:					
20/05/2024						
Count of Band	Bedrooms					
					Grand	
Row Labels	1	2	3	5	Total	
Submitted online	1	3				4
Band A - Urgent Housing Need		1		1		2
Band B - High Housing Need	2	1				3
Band C - Medium Housing Need	1		3			4
Band D - Low Housing Need	5	5	2			12
Grand Total	9	10	5	1		25

Alderholt - Preferred Area housing	g need:					
20/05/2024						
Count of Band	Bedrooms					
					Grand	
Row Labels	1	2	3	4	Total	
Submitted online	3	3	1			7
Band A - Urgent Housing Need	1		1			2
Band B - High Housing Need	2		4			6
Band C - Medium Housing Need	4	3	2			9
Band D - Low Housing Need	10	7		1		18
Grand Total	20	13	8	1		42

Kind regards

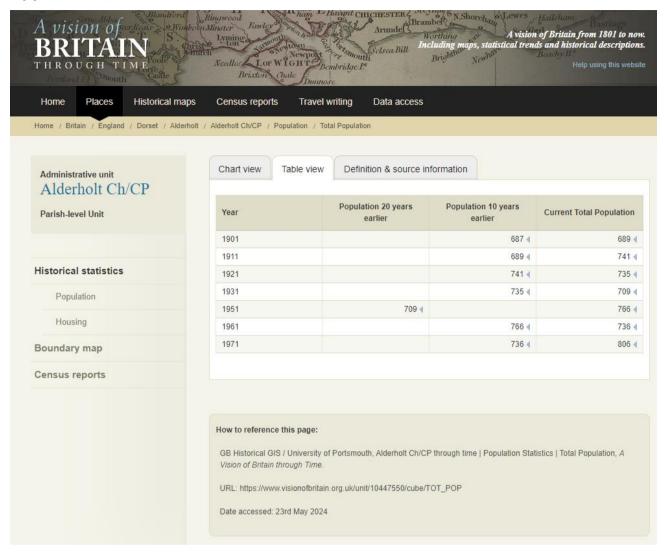
[redacted]
Technical Officer Assistant

# Housing Enabling Dorset Council

01305 252445 dorsetcouncil.gov.uk



## Appendix A3. Vision of Britain Census Records



## Appendix A4. 2017 Village Survey

#### Extract from

Report from Alderholt Parish Council (APC) to Simon Trueick at EDDC on the findings of the Village Expansion section of the Alderholt Local Plan Survey undertaken in March & April 2017

 $\frac{https://www.alderholtparishcouncil.gov.uk/\_UserFiles/Files/Your%2oCouncil/Local%2oPlan/Report%2ofrom%2oAPC%2oto%2oEDDC%2oon%2oLPS%2o%2oVillage%2oExpansion.pdf$ 

Report from Alderholt Parish Council (APC) to Simon Trueick at EDDC on the findings of the Village Expansion section of the Alderholt Local Plan Survey undertaken in March & April 2017

APC undertook this survey by issuing a paper copy to each household within the parish, asking for either the hard copy or the on line version to be completed. As it is impossible to determine whether the surveys had been completed by more than one individual from each household, the results are based household responses but there is a margin of error due to this point.

Each response required the post code and a total of 460 responses were received; overall there was a response from all over the village except for some of the furthest outreaches eg Cripplestyle and Hare Lane, as might be anticipated.

The Village Expansion section asked for views on the possibility of future development in the village, and the forms and types of development available. Is the village large enough as it is or do we need some more housing to maintain and sustain the existing facilities we have?

The questions and results in italics are below:-

29. If there is some planned development and growth of Alderholt, what would be your vision of Alderholt and what are your key issues/priorities? Please give your comments below.

There were 287 extensive text responses and the greatest issues/priorities were:-

These appear to major on the need to retain the village feel of Alderholt in its rural setting, a requirement for the infrastructure to be improved/provided before any development, especially the road network into and out of the village, and better public transport/bus service. Also, any development should "look nice" – be well designed and generally small scale. There was an emphasis also on the fact that children have to move away at present due to the level of unaffordability and unavailability of property in Alderholt.

Mention was made of the need for there to be adequate parking provision for any development, and that the provision of workplaces in the village would help reduce the level of commuting into and out of the village.

## Appendix A5. 2019 Alderholt Village Survey questions and results Have your say in Alderholt's future

The Parish Council is gathering information to provide a clearer picture of what Alderholt is like as a village, how much (or how little) we rely on outside areas for our jobs and day-to-day needs and what our needs are for housing, employment and local



services. Dorset Council has decided to prepare a new Local Plan; this will mean thinking again about number of extra houses to be built in the village (the Parish Council objected to the previous proposal for at least 1,000). We hope to represent the views of residents and influence the plan. Please take time to respond (there is one form per household) - the more responses we have, the more weight our evidence will carry. Return this form to the Parish Office, or deposit it in one of the collection boxes located at the Church; the Chapel; The Churchill Arms; The Reading Room; St James' School or The Co-op, by FRIDAY 25<sup>th</sup> OCTOBER 2019.

1.	Please enter your post code in the box below. This will not identify your property but allows us to evaluate
	responses from different areas of the Parish. No personal information is being collected and forms will be treated
	in strict confidence.

2. Please indicate the number of people in your household for each age group. Please tick one box per age.

	0	1	2	3	4	5
0 to 4						
5 to 15						
16 to 24						
25 to 34						

	0	1	2	3	4	5
35 to 54						
55 to 64						
65 to 74						
75 +						

3. Alderholt has a range of facilities - please indicate how often your household uses these and tick the final column if you generally go elsewhere.

	Most days	At least weekly	At least monthly	Rarely	Never	Generally go elsewhere
Alderholt Village Hall						
Any of the Churches / Chapels						
Co-op and/or the Post Office						
Cranborne Common						
Doctor's Surgery (Park Lane)						
Equipped children's play area						
First School (St James')						
MUGA						
Outdoor gym						
Pub (The Churchill Arms)						
Recreation ground						
Sports and Social Club						
Wolvercroft Garden Centre						

Please list any other services or businesses you use:

Alderholt								iiiik di C		ana a	i e i eu	iy iicc	.ucu ii	•	
We know that	it is ve	ry unl	ikely we	would	d get a	second	ary scl	hool, for	example,	but it	is usef	ul to h	ave an	idea o	f what
local people fe	el the I	Parish	Counci	l shoul	ld enco	ourage,	or req	uest if fu	rther hor	nes ar	e planr	ed.			
					Loc	al Facil	ity / S	ervice n	eeded /	to im	prove				
Priority 1															
Priority 2															
Priority 3															
5. Where do									hree bo	kes pe	r row, v	vith 1	for mo	st freq	uently
			ternet livery	Bourner	mouth	Fordingbrid	dge	Ringwood	Salisbu	y S	Southampt	on	Verwood	Ot	her <sup>*</sup>
For food and general groce	ries														
For other shopping nee (e.g. clothes)	ds														
*If answered	other'	– nle	ase des	cribe	$\neg$										
6. Is your re					rmall	y comb	ined	with oth	er trips	? <b>√</b> Ti	ck all b	oxes th	nat app	ly	
No		-		-											
Yes - work		-		-											
Yes - school	run	-		Do	escribe										
Yes - other				De	escribe	e:									
7a. Is someo the Alde market. Pl	rholt	area	in the	next	10 ye	ars? As	they	would be	e unable	to af	ford to	buy o	r rent		
No				Ī.	Yes – a	afforda	ble sh	ared ow	nership	(part	rent p	art bu	y)		
Yes – afforda	ble to	rent		T	Yes – a	afforda	ble to	buy (sta	rter hor	ne / d	liscour	ted sa	le pric	:e)	
7b. If you an the final c	olumn	'SP' i	f you m	ay nee	d whe	elchair	access	ible hous	ing or h	ousing	which	has be			
Bedrooms	1	2	3	4	5+	SP		Bedro		1	2	3	4	5+	SP
Dwelling 1								Dwe	lling 2						
7c. If you or the Coun												me, a	re you	alrea	dy on
Yes		No													
8a. Is anyone	in yo	ur ho	ouseho	ld in p	aid er	mployn	nent?								
Yes		No													

4. Are there Alderhol								ink are	missing	and a	re rea	ly nee	eded in		
We know that local people fe	it is ve	ry unl	ikely w	e woul	ld get a	seconda	ary sc						ave an	idea o	f what
rocar people re		011011	count				_	ervice n							
Priority 1															
Priority 2															
Priority 3															
5. Where dused, 2 fo						_			hree bo	es pe	r row, ı	with 1	for mo	st free	quently
			ternet livery	Bourne	mouth	Fordingbrid	ge	Ringwood	Salisbur	y :	Southampt	on	Verwood	0	ther*
For food and general groce	ries						Т			Т		T		Т	
For other shopping nee (e.g. clothes)	ds						T					T		Γ	
*If answered	'other'	– ple	ase de	scribe	$\neg$										
No Yes - work Yes - school		food	shopp	oing no	ormall	y combi	ined	with oth	er trips	<b>√</b> Ti	ck all b	oxes th	nat appi	У	
Yes - other Describe:															
the Alde	7a. Is someone in your home (or immediate family living away) likely to require an affordable home in the Alderholt area in the next 10 years? As they would be unable to afford to buy or rent on the oper market. Please ✓ tick one box, or more than one box if there is more than one home needed.														
No			Т	7 [	Yes –	affordal	ole sh	ared ow	nership	(part	rent p	art bu	у)	$\neg$	
Yes – afforda	ble to	rent		] [	Yes -	affordat	ole to	buy (sta	rter hor	ne/d	liscour	ted sa	ale pric	e)	
7b. If you an the final o	olumn	'SP' I	f you n	nay ne	ed whe	elchair o	occess	ible hous	ing or ho	ousing	which	has be			
Bedrooms	1	2	3	4	5+	SP		Bedro	ooms	1	2	3	4	5+	SP
Dwelling 1								Dwe	lling 2						
7c. If you or the Coun												me, a	re you	alrea	idy on
Yes		No													
8a. Is anyone	in yo	ur ho	ouseho	old in p	paid e	mploym	ent?								

No

Yes

Date: 12/07/2019  See 1300  D	Date: 12/07/2019  The property of the propert	Date: 12/07/2019 som 15/000  West result from the second of the second o	Date: 12/07/2019  Social Stories  Registration  Social Stories  Registration  Social Stories	Control of the contro	Date: 12/07/2019 Sales Boom Security Control of Control		Authorn		
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## Q3. How often your household uses the following facilities in Alderholt.

	frequently - at least	less frequently but at	rarely / never
	weekly	least monthly	
Со-ор	81.3%	13.6%	3.1%
Wolvercroft	10.3%	50.7%	37.0%
Recreation Ground	23.2%	18.2%	57.2%
Village Hall	8.6%	16.7%	73.4%
Churches	13.5%	10.3%	73.1%
Churchill Arms	7.2%	15.6%	69.1%
Cranborne Common	9.1%	9.8%	76.3%
Play area	5.5%	12.9%	81.1%
Sports Social Club	5.8%	5.0%	87.5%
Doctor's surgery	1.0%	8.1%	74.2%
St James School	7.7%	1.2%	89.7%
Outdoor Gym	2.9%	4.1%	91.8%
MUGA	1.0%	3.6%	95.2%

Some 15% of respondents also referred to using the garage, and 10% to using the Reading Rooms, under the 'free text' field for what other services or businesses they use.

## Q4 What facilities or services are missing and are really needed in Alderholt?

	Top priority	Second priority	Total ment	tions
Bus Service	128	1	130	31.0%
More shops	34	35	85	20.2%
Doctors	29	22	63	15.0%
Traffic management / improved roads	30	11	52	12.4%
Bus shelters	1	31	46	11.0%
Footpaths	9	10	30	7.1%

Suggestions of other facilities or services were mentioned by less than 5% of the responses.

## Q5: Where do you do your main shopping for food and groceries?

	Most Frequent		Top 3 destinations	
Ringwood	133	32.0%	305	73.3%
Verwood	105	25.2%	218	52.4%
Fordingbridge	58	13.9%	197	47.4%
Internet delivery	47	11.3%	77	18.5%
Bournemouth	21	5.0%	75	18.0%
Salisbury	14	3.4%	72	17.3%
Ferndown	12	2.9%	23	5.5%

Alderholt	11	2.6%	30	7.2%
Southampton	9	2.2%	20	4.8%

## Q5: Where do you do your main shopping for other goods?

	Most Frequent		Top 3 destinations	
Salisbury	105	59.8%	251	25.0%
Bournemouth	131	58.6%	246	31.2%
Ringwood	45	37.9%	159	10.7%
Internet delivery	76	32.4%	136	18.1%
Southampton	20	25.5%	107	4.8%
Fordingbridge	19	16.2%	68	4.5%
Verwood	1	2.9%	12	0.2%
Ferndown	0	1.0%	4	0.0%
Alderholt	0	0.2%	1	0.0%

## Q6: Is your regular food shopping normally combined with other trips?

No	65.3%
Yes – work	11.7%
Yes - school run	1.2%
Yes - other	21.8%

The most common 'other' was for social events, which accounted for 3.7% of responses.

## Q8a. Is anyone in your household in paid employment?

No	189
Yes	216

Total working: 381 persons (based on answers to Q8b)

Figure 7. Q8b. If yes, please state where those people work?

Alderholt	62	16.3%
Not fixed	40	10.5%
Fordingbridge	38	10.0%
Bournemouth	32	8.4%
Ringwood	29	7.6%
Salisbury	28	7.3%
Southampton	24	6.3%

Other workplaces counted for less than 5% of the responses.

## Q8c. What form of transport do they normally use for most of that journey?

Car (driver)	82.3%
--------------	-------

At home	6.6%
Walk	2.4%
Car (passenger)	2.4%
Cycle	1.9%
Motorbike or Scooter	1.6%
Van or Lorry	1.3%
Train	0.8%
Bus	0.5%
Other	0.3%

## Q12. Anything of particular value in the village

Rural setting	214	51.0%
Shops	156	37.1%
Village feel	156	37.1%
Public footpaths	128	30.5%
Recreation ground	98	23.3%
Garage	83	19.8%
Community Spirit	71	16.9%
Churches	68	16.2%
Views	40	9.5%
Pub	33	7.9%
Peace and quiet	25	6.0%
Location	21	5.0%

Other suggestions counted for less than 5% of the responses.

## Appendix A6. Aldi and Lidl website extracts

12/05/2024, 00:09

Property - Required Towns - ALDI UK



## **Site Requirements**

Our sustained growth means we are continually expanding our real estate portfolio to help achieve our ever-growing goals for 2023.

We have ambitious acquisition and development plans and prefer to purchase freehold, town centre or edge of centre sites suitable for development in towns with a population of 15,000 or more. We are willing to explore all opportunities including developer led schemes and existing or new retail units.

Our yield profile is increasingly adding value to developments.



#### Site Size

Minimum circa 2 acre site to accommodate a 18-20k ft<sup>2</sup> unit and 100+ dedicated parking spaces. Note - for London a minimum of 8k ft<sup>2</sup>



#### Main Road

Prominent main road frontage with good visibility and access



#### Retail Park

Retail parks. Minimum area of 18-20k sqft



#### **Town Centre**

Either central or edge of centre location



#### Tenure

Freehold or leasehold



#### Footfa

Approximately 15,000 catchment area



#### Locality

Minimum of 1.5km from an existing store or potential site for a relocation from an existing store



#### Contac

If you meet these requirements please get in touch

### **Your Fees**

Typical agent fees are 1.5% of the purchase price (freehold) or 10% of the annual rent (leasehold) finder's fee.\*

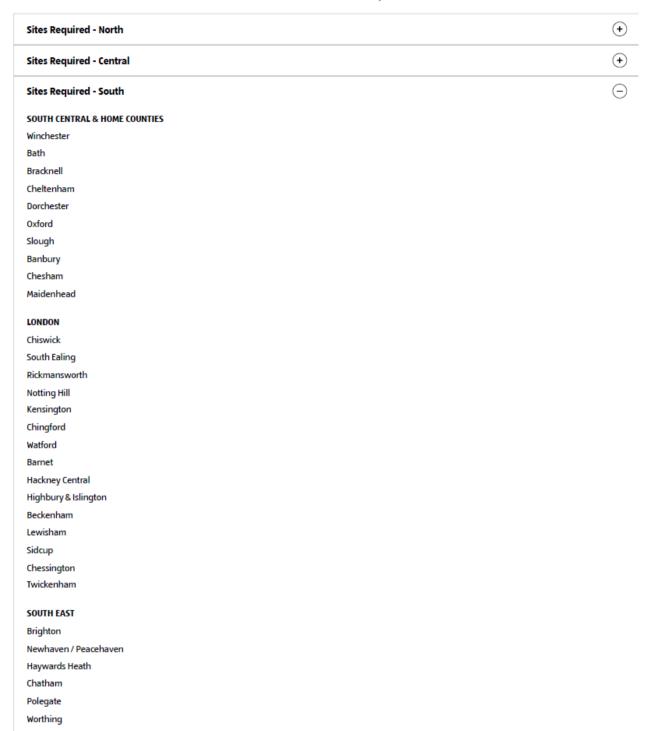
 $Fees \ regarding \ the \ acquisition \ of portfolio \ purchases \ can be \ discussed \ and \ agreed \ from \ the \ outset.$ 

\*Acting as our agent on previously unknown sites.

DOWNLOAD OUR ACQUISITIONS GUIDE (HTTPS://CDN.ALDI-DIGITAL.CO.UK/MXGZOMKHP2N04Z1Z1QCEIUY\$XB8.PDF)

For national, group, multi site or mixed use deals please contact us on the following: <a href="mailto:info.nationalproperty@aldi.co.uk">info.nationalproperty@aldi.co.uk</a> (mailto:info.nationalproperty@aldi.co.uk)

#### Please click the below to see all of the required locations.



https://www.aldi.co.uk/corporate/property/required-towns





## Strong in every location

### Individuality

We are a strong local supplier in all our locations: our markets are found in classic standalone locations, as well as in retail parks, shopping centres and central locations in densely populated areas. We are always looking for store and warehouse areas as freehold, leasehold and long leasehold opportunities and as well as developed or undeveloped properties.



### Always close to our customers

Standalone site

Modern local shopping facilities call for customer-orientated and convenient shopping facilities. Where possible, we therefore provide the most spacious sales areas possible to enhance the customer's shopping experience.



## Bringing vitality to Retail Parks

Retail park

Attracting high footfall volumes, we are an asset to retail parks and our customers benefit from being close to other shops.



## Urban store expansion calls for flexibility

Central locations

We also want to be close to our customers in densely populated urban areas. Through our stores in central locations, we provide local shopping facilities for the residential population, offering an attractive range of food for customers on foot or through other modes of transport.

## Our location criteria

gures and requirements

https://www.realestate-lidl.co.uk/new-store-site-requirements



offer.



Customer parking:	100+ at ground level	
Developed or undeveloped properties:	1.5+ acres	
Population in the catchment area:	from 20,000	
Population of the main centre:	from 5,000	
Site area:	18,000 sq ft + (1,672 m²)	

## Requirements for the right distribution warehouse site

- Logistics location
- Good road connections; close to a motorway interchange
- · Ability for a 24-hour operation and HGV transport
- Connection to local public transport

0 acres site area





## Light and spacious

Open, bright and customer-oriented

A relaxing place to shop, a pleasant place to work – our new store concept is anything but ordinary. A modern physical appearance, pioneering technology and a customer-oriented sales floor, create a completely new shopping experience for our customers.









## A new generation of stores

#### Highlights

Lidl stores are not just a relaxed and pleasant place to shop – the clever architectural design and an innovative technology concept also protect the environment. We have greatly improved several areas to create a great customer experience.



#### Customer convenience

Shopping experience

Generous outdoor parking spaces, wide aisles, attractive product presentation and customer toilets with baby-changing facilities make enjoyable customer experience. the bright, modern sales floor



#### Modern welfare areas

Great working conditions

Colleagues benefit every day from redesigned welfare areas for training courses and e-learning sessions. The design and furnishings create a bright and friendly atmosphere.



#### Sustainable technology

For the environment

When it comes to technical equipment, sustainability is the key element of the concept. For example, stores are fitted entirely with LED lighting as well as a state-of-the-art interconnecting heating and air



or electric car charging stations.



Assortment

Attractive design





Locations:	Town centre, edge of centre and urban area.
Tenure type:	Freehold, long leasehold or leasehold
Site area:	Developed or undeveloped from 1.5+ acres
Store area:	Developed or undeveloped from 18,000 sq ft + $(1,672 \text{ m}^2)$
Car parking:	100+ dedicated car parking spaces

## Appendix A7. Neighbourhub

https://www.neighbourhub.uk/ extract 24/05/24



We are **NeighbourHub**, a specialist developer and investor of local district centres. We create community focused and successful local NeighbourHubs by working with strategic landowners and residential developers to create places people love.

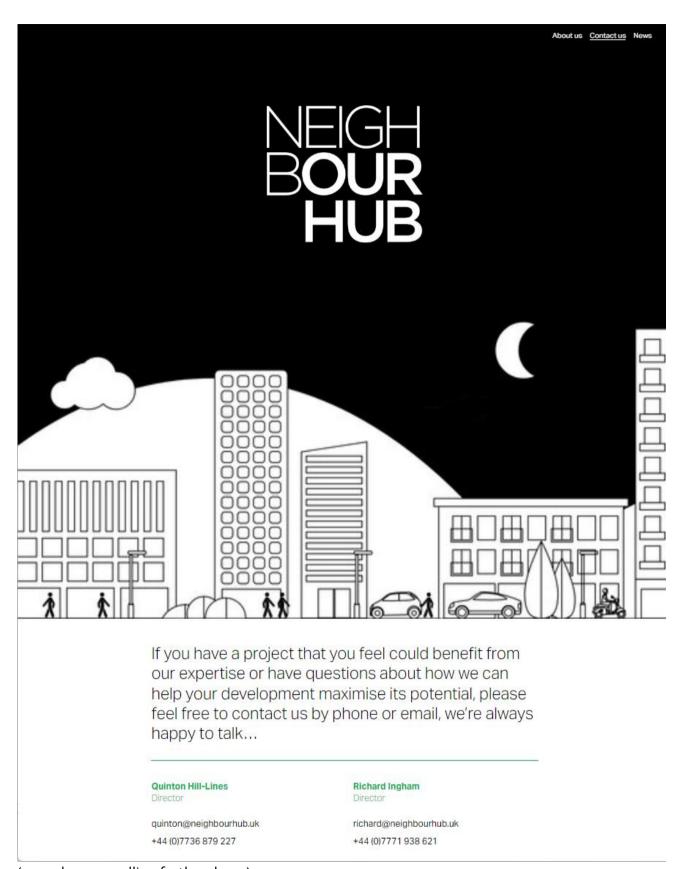
We believe a valued local NeighbourHub is the beating heart of a community and should be attractive, offer a diversity of uses and be easily accessible to the local and wider community. Finding the right blend of amenity provision and commercial occupiers is key to delivering a local centre that will be used and cherished by the community.

Our inclusive approach to placemaking enables us to understand how residents will interact with the space and determine the key commercial value drivers. Early consultation and collaboration with local stakeholders enables us to deliver a sustainable and flourishing local centre.

When it comes to optimizing space and value, having detailed knowledge of occupier requirements is essential as each has its own nuanced operating model. Our relationships and experience of developing convenience stores, local retail and leisure and working with medical and nursery providers, enables us to design well balanced centres.

The benefits of new technology and innovation in management, construction and decabonisation are applied across our schemes to improve and enhance both delivery and the long-term occupation of the space

Our experience of curating well-planned and commercially viable NeighbourHubs often unlocks further residential development – as communities grow so does the demand for local services.



(map shown scrolling further down)

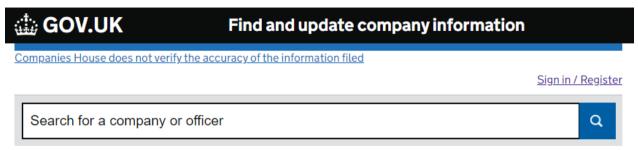


#### To be announced soon

Exciting new projects in Cambridgeshire, Hampshire, Kent and Northamptonshire to be announced in the forthcoming weeks.

#### Contact is

@2021 Naighbourhub Limited. Registered address: 38 Lyndhurst Road, Bevleyheath, Kent DA7 6DF, Registered No: 12716346. Disclaimer https://find-and-update.company-information.service.gov.uk/company/12716346

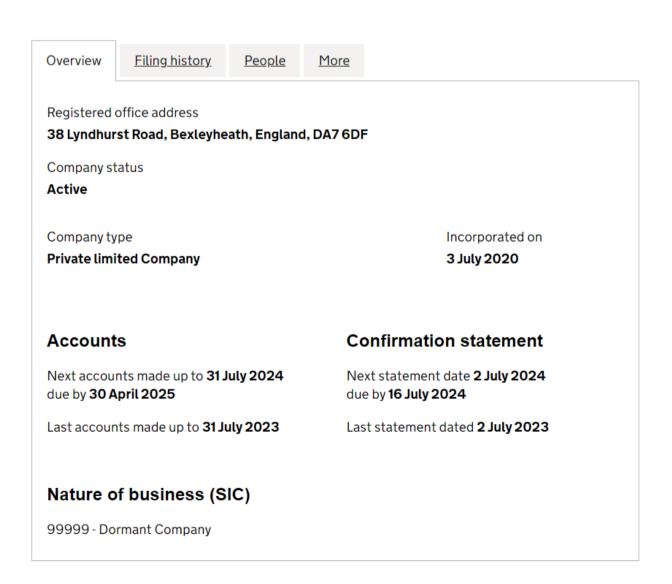


Advanced company search

## NEIGHBOURHUB LIMITED

Company number 12716346

Follow this company File for this company



Latest accounts	provided:	26 March	2024, made 1	Jp to 31 Jul	y 2023
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Company Registration No. 12716346 (England and Wales)

NEIGHBOURHUB LIMITED UNAUDITED ACCOUNTS FOR THE YEAR ENDED 31 JULY 2023

## NEIGHBOURHUB LIMITED COMPANY INFORMATION FOR THE YEAR ENDED 31 JULY 2023

**Directors** Hill-Lines Q

Ingham R

Company Number 12716346 (England and Wales)

Registered Office 38 LYNDHURST ROAD

BEXLEYHEATH DA7 6DF ENGLAND

Accountants Smith Kiew Partnership

38 Lyndhurst Road Bexleyheath Kent DA7 6DF

## NEIGHBOURHUB LIMITED STATEMENT OF FINANCIAL POSITION AS AT 31 JULY 2023

	Notes	2023 £	2022 £
Current assets			
Debtors	4	2	2
Net current assets		2	2
Net assets		2	2
Capital and reserves			
Called up share capital		2	2
Shareholders' funds		2	2

For the year ending 31 July 2023 the company was entitled to exemption from audit under section 477 of the Companies Act 2006 relating to small companies. The members have not required the company to obtain an audit in accordance with section 476 of the Companies Act 2006.

The directors acknowledge their responsibilities for complying with the requirements of the Act with respect to accounting records and the preparation of accounts.

These accounts have been prepared and delivered in accordance with the provisions applicable to companies subject to the small companies' regime and in accordance with the provisions of FRS 102 Section 1A - Small Entities. The profit and loss account has not been delivered to the Registrar of Companies.

The financial statements were approved by the Board of Directors and authorised for issue on 19 March 2024 and were signed on its behalf by

Ingham R Director

Company Registration No. 12716346

## NEIGHBOURHUB LIMITED NOTES TO THE ACCOUNTS FOR THE YEAR ENDED 31 JULY 2023

#### 1 Statutory information

Neighbourhub Limited is a private company, limited by shares, registered in England and Wales, registration number 12716346. The registered office is 38 LYNDHURST ROAD, BEXLEYHEATH, DA7 6DF, ENGLAND.

#### 2 Compliance with accounting standards

The accounts have been prepared in accordance with the provisions of FRS 102 Section 1A Small Entities. There were no material departures from that standard.

#### 3 Accounting policies

The principal accounting policies adopted in the preparation of the financial statements are set out below and have remained unchanged from the previous year, and also have been consistently applied within the same accounts.

#### Basis of preparation

The accounts have been prepared under the historical cost convention as modified by the revaluation of certain fixed assets.

#### Presentation currency

The accounts are presented in £ sterling.

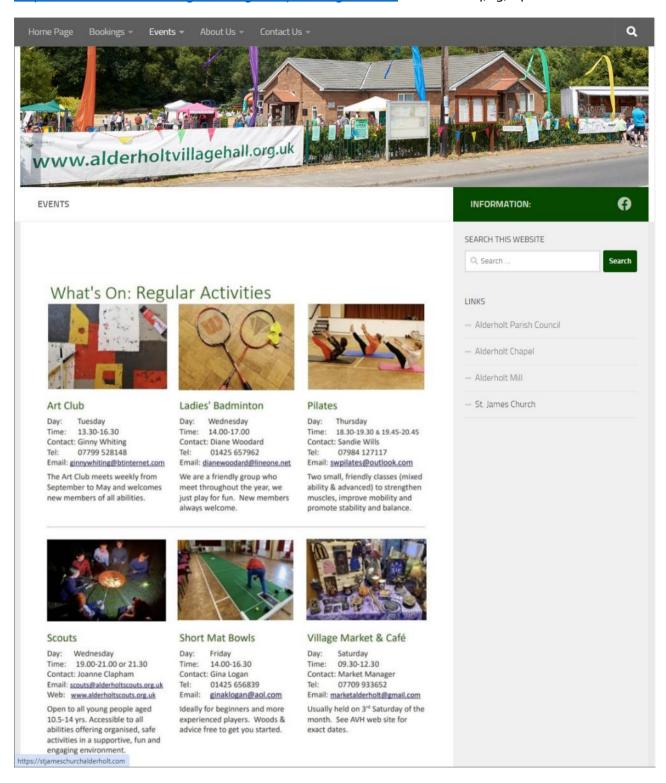
4	Debtors	2023	2022
		£	£
	Amounts falling due within one year Other debtors	2	2

### 5 Average number of employees

During the year the average number of employees was 0 (2022: 0).

## Appendix A8. Alderholt Village Hall Activities

https://www.alderholtvillagehall.org.uk/upcoming-events/ extracted 24/05/24



## Appendix A9. Emails from Cranborne and Fordingbridge GP Practices

From: [redacted] (Cranborne Practice)
Sent: Wednesday, May 15, 2024 10:24 AM

To: Alderholt Parish Council < clerk@alderholtparishcouncil.gov.uk >

**Subject:** The Cranborne Practice

Thank you for the opportunity to comment on the proposed development in Alderholt.

We have not been formally briefed on the residential mix of the 1700 homes and the potential demand for GP services.

We have established from a media release that the homes would consist of 43 one-bedroom, 150 two-bedroom, 138 three-bedroom, and 64 homes with four or more bedrooms—including an 80-bed care home.

It is understood that the development includes the provision of a medical centre (source <u>Dorset villagers worried over plans for 1,700 new homes - BBC News</u>)

As of December 2023, the average number of patients per GP practice in England amounted to ten thousand, The Cranborne Practice supports patients more than the average with 12,800 patients.

To support these patients the practice has:

- 12 GP's
- 7 Nurses
- 6 Health Care Assistants
- 8 administrators
- 9 Medical Receptionists (some part-time)
- 5 Dispensing staff

To allocate resources this means that.

- Each GP is responsible for 1,066 patients.
- Each nurse has a potential patient list of 1,828

Each week, the Practice receives over 1,900 phone calls and issues 1,300 repeat prescriptions. We also see over 900 patients in person and undertake over 1,400 telephone consultations.

An additional 17,000 homes and an 80-bed nursing home would potentially add an additional 3,400 people of all ages, some of whom will require more intensive GP support.

In making provision for Health Care, it is also prudent not just to plan for today but to ensure that there is the strength and depth of service provision to support an ageing population in Alderholt which is a rural community.

### **Cranborne Practice position:**

We could not initially support the increased number of residents from our existing resources without significantly compromising our current services and high patient satisfaction, which currently stands at 98%.

However, The Cranborne Practice is recognised as one of the top-performing surgeries in the area and has systems, processes, and experience that, with the right resources, can be reapplied for Alderholt

to support the new community created as a result of 1700 new homes to deliver exceptional healthcare.

Based on our existing support and to deliver a consistent service, we would require:

- An additional 3 full-time GP's
- An additional 2 Nurses
- Additional reception staff to cover surgery hours
- · 2 additional admin staff
- An additional pharmacist

These are only outline numbers and are subject to a proper business case. In addition there is:

- IT
- Staff recruitment
- Training
- Maintenance
- Housekeeping
- Security etc

Neither the Cranborne Practice nor the PCN is in a position, based on current budgets, to provide these services. We are unable to accommodate the increased demand for the practice from the new development, but with the right funding our Lake Road Surgery Branch could bring the new proposed medical centre under our wing and management.

I hope you find this response of help.

Kind regards

Jo Morris (Cranborne Practice)

**Managing Partner** 

From: SURGERY, Fordingbridge (FORDINGBRIDGE SURGERY) < fordingbridgesurgery@nhs.net>

Sent: Monday, May 13, 2024 9:34 AM

**To:** Alderholt Parish Council <clerk@alderholtparishcouncil.gov.uk> **Subject:** FW: CONFIDENTIAL: Potential Development in Alderholt

Dear Mrs Brooker

Thank you for your email.

We made a submission to the original planning and do not wish to make any further comment other than we will make every effort to provide services to all our catchment population and have no plans to alter our catchment area.

The Fordingbridge GP practice provides GP services to most of the population of Alderholt, the majority of residents travel to our Fordingbridge site.

Should the population of Alderholt grow significantly we would like to operate a dedicated health centre in Alderholt, providing a range of clinical and complimentary services. To do this we would require a site capable of supporting such facilities but more importantly a larger population base to underpin such services and to guarantee NHS funding for such a facility.

We have listened to the plans from Dudsbury Homes. We feel that if Alderholt is to enlarge it should have a new health facility providing a comprehensive 21st century service to Alderholt and its wider community. We would aim to provide GP services but also offer space to other practitioners such as physiotherapists to deliver a health facility where residents need them.

Dudsbury Homes' concept masterplan seeks to provide services and facilities to provide for the needs of all the new and old residents and should this development be granted we would look forward to taking an active role in delivering health services in Alderholt.

You will need to contact the relevant Commissioners in Hampshire and Dorset for advice on any criteria for provision of new premises based on population numbers.

Kind regards

The Fordingbridge Surgery

The Fordingbridge Surgery Dr P Downes & Partners Bartons Road FORDINGBRIDGE Hampshire SP6 1RS Tel: 01425 652941 www.fordingbridgegps.co.uk

Information in this message is confidential and may be legally privileged. It is intended solely for the person to whom it is addressed. If you are not the intended recipient please notify the sender, and please delete the message from your system immediately. This e-mail and any attachments have been checked for viruses however you should carry out your own check before opening any of the attachments.

## Appendix A10. Pre-school Nursery provision

Extract from <a href="https://www.alderholt.dorset.sch.uk/come-and-join-our-nursery/">https://www.alderholt.dorset.sch.uk/come-and-join-our-nursery/</a> 24/05/24



Extract from <a href="https://files.ofsted.gov.uk/v1/file/50181483">https://files.ofsted.gov.uk/v1/file/50181483</a> 24/05/24



## Inspection of Kingswood Day Nurseries Limited

The Old School, Daggons Road, Alderholt, Fordingbridge, Hampshire SP6 3DN

Inspection date:

9 March 2022



# **Setting details**

Unique reference number EY280673
Local authority Dorset
Inspection number 10125837

Type of provision Childcare on non-domestic premises

Registers Early Years Register, Compulsory Childcare

0 to 4

Register, Voluntary Childcare Register

Day care type Full day care

Age range of children at time of

inspection

Total number of places 42

Number of children on roll 87

Name of registered person Kingswood Day Nurseries Limited

Registered person unique

reference number

RP908163

Telephone number 01425 656451

Date of previous inspection 13 January 2014

# Information about this early years setting

Kingswood Day Nursery registered in 2004. The nursery is privately owned. It operates from a former school premises on the edge of the village of Alderholt, in Dorset. The nursery is open Monday to Friday, from 7.45am until 6pm, for 50 weeks of the year (closing a week in August and over the Christmas period). They offer funded education for two-, three-, and four-year-old children. The nursery employs 12 members of staff who work directly with the children. Of these, ten hold an appropriate childcare qualification at level 3 and two at level 5.

# Information about this inspection

## Inspector

Rachel Cornish

# Appendix A11. 2011 and 2021 Census data downloads

QS702EW - Distance travelled to work							
ONS Crown Copyright Reserved [from Nomis on 6 March 2019]							
population	All usual	residents	aged 16	to 74 in er	nploymer	nt the wee	k before
	the cens	US	_				
units	Persons						
date	2011						
Distance travelled to work	uacount	yo <u>9</u> :	parish2	011:			
	Dorset	•	E04003	362 :			
			Alderho	olt			
All categories: Distance	190,903		1,619				
travelled to work							
Less than 2km	35,084	18.4%	84	5.2%			
2km to less than 5km	23,729	12.4%	202	12.5%			
5km to less than 10km	28,769	15.1%	205	12.7%			
10km to less than 20km	29,388	15.4%	328	20.3%			
20km to less than 30km	10,486	5.5%	229	14.1%			
30km to less than 40km	6,476	3.4%	62	3.8%			
40km to less than 60km	4,090	2.1%	31	1.9%			
6okm and over	7,195	3.8%	87	5.4%			
Work mainly at or from home	28,022	14.7%	223	13.8%	_	_	_
Other	17,664	9.3%	168	10.4%			

TSo58 - Distance travelled to work							
ONS Crown Copyright Reserved	[from No	mis on 14	April 202	23]			
population		All usual residents aged 16 years and over in employment the week before the census					
units	Persons						
date	2021						
Distance travelled to work	lacu2021	ı:Dorset	(calculated from 1:E0102 1:E0102 E00		0a2021: E00103 309		
Total: All usual residents aged 16 years and over in employment the week before the census	167,777		1,591		717	700	174
Less than 2km	20,688	12.3%	57	3.6%	31	22	4
2km to less than 5km	13,127	7.8%	140	8.8%	80	53	7
5km to less than 10km	16,944	10.1%	139	8.7%	57	66	16
10km to less than 20km	18,176	10.8%	212	13.3%	105	90	17
20km to less than 30km	8,677	5.2%	133	8.4%	55	62	16

30km to less than 40km	6,296	3.8%	39	2.5%	17	15	7
40km to less than 60km	4,856	2.9%	45	2.8%	22	19	4
6okm and over	3,641	2.2%	27	1.7%	13	12	2
Works mainly from home	47,397	28.2%	508	31.9%	200	243	65
Works mainly at an offshore	27,975	16.7%	291	18.3%	137	118	36
installation, in no fixed place, or							
outside the UK							

## Appendix A12. Workspace Equivalence Calculations

The calculations are based on average workspace densities as researched and updated in 2015 by the Homes and Community Agency<sup>36</sup> and the more recent but London-focused research by CAG Consultants<sup>37</sup>. These suggest the following densities for the land uses proposed as part of this appeal (or best proxies), and the FTE equivalents based on the project units are shown in the final column.

Figure 8. Workforce equivalent calculations

Use Class	HCA density	CAG (sqm per	Floorspace	Workforce
	(sqm per FTE)	employee) <sup>38</sup>	estimate	equivalent
B2 Industrial & Manufacturing	36	36.0 = 34.2 adjusted	3,000m²	83 – 88
B8 Storage & Distribution (final mile)	70	63.0 = 50.0 adjusted	3,000m²	48 – 60
C2 Nursing Home using C1 Hotels (upscale / luxury)	1 – 2 per 1 bed	o.8 – 1.6 beds/employee	8o bedspaces	50 – 100
E(a) (formerly A1) Retail (excluding retail warehouse)	15 – 20	17.5	1,258m²	72
E(b) (formerly A <sub>3</sub> ) Restaurants & Cafes	15 – 20	17.5	673m²	38
E(d) (formerly D2) indoor sport, using budget fitness centre	100	90	316m²	4
E(e) (formerly D1) medical using A2 (Finance & Professional) as proxy	16	16.0	724m²	45
E(g)(i) (formerly B1a) General Office	10-13	11.9 – 13.5 = 11.3 adjusted	2,026m²	160 – 179
E(g)(iii) (formerly B1c) Light Industrial	47	55.8	3,000m²	54
Total				553 – 640

In coming to these figures, the following assumptions were made:

<sup>&</sup>lt;sup>36</sup> Employment Density Guide 3rd edition, November 2015, Homes and Community Agency <a href="https://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/national-evidence/NE48\_employment\_density\_guide\_3rd\_edition.pdf">https://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/national-evidence/NE48\_employment\_density\_guide\_3rd\_edition.pdf</a>

<sup>&</sup>lt;sup>37</sup> London Employment Sites Database 2021, June 2022, CAG Consultants https://www.london.gov.uk/sites/default/files/lesd\_2021\_final\_report\_22jun2022.pdf

<sup>&</sup>lt;sup>38</sup> The LESD report converts the HCA to sqm per density equivalent and also considers adjustments based on market experience.

- With the exception of the 1000m² office space, the other employment uses at the business park (9,000m²) are distributed evenly between light industrial, general industrial and warehousing, and office space is considered acceptable in this location (as a main town centre use). An adjusted calculation showing the removal of office space from the business park is provided below.
- The local centre uses are distributed between main town centre uses as indicated in the Appellant's Retail Impact Assessment. As the proposal includes a community building potentially focused on sport, the 'budget' end of D2 fitness centre use is used as a proxy, with the CAG adjustment pro-rata'd from the mid-market fitness centres. It is evident from the store requirements set out by Aldi and Lidl that this would accommodate their store formats which require 1,672m². A further 2 x 50m² units should also be factored in (noting that the Appellant is suggesting up to 7 retail units). An adjusted calculation showing a minimum of 1,672m² + 2 x 50m² = 1,772m² retail space (and a further reduction of 514m² in office space) within the local centre is provided below.
- The C1 hotel is the best proxy for a care home, using the upper range (upscale luxury hotels). This is based on my recent involvement in care home applications, their evidence suggests a 1:1 ratio at around 40 50 bed spaces, becoming more efficient the more bed spaces services.

Figure 9. Workforce equivalent calculations (adjustments for business park restriction on offices and Aldi / Lidl store formats applied)

Use Class	HCA density	CAG (sqm per	Floorspace	Workforce
	(sqm per FTE)	employee) <sup>39</sup>	estimate	equivalent
B2 Industrial & Manufacturing	36	36.0 = 34.2 adjusted	3,333m²	83 – 88
B8 Storage & Distribution (final mile)	70	63.0 = 50.0 adjusted	3,333m²	48 – 60
C2 Nursing Home using C1 Hotels (upscale / luxury)	1-2 per 1 bed	o.8 – 1.6 beds/employee	8o bedspaces	50 – 100
E(a) (formerly A1) Retail (excluding retail warehouse)	15 – 20	17.5	1,772m²	101
E(b) (formerly A <sub>3</sub> ) Restaurants & Cafes	15 – 20	17.5	673m²	38

<sup>&</sup>lt;sup>39</sup> The LESD report converts the HCA to sqm per density equivalent and also considers adjustments based on market experience.

Use Class	HCA density	CAG (sqm per	Floorspace	Workforce
	(sqm per FTE)	employee) <sup>39</sup>	estimate	equivalent
E(d) (formerly D2) indoor sport, using budget fitness centre	100	90	316m²	4
E(e) (formerly D1) medical using A2 (Finance & Professional) as proxy	16	16.0	724m²	45
E(g)(i) (formerly B1a) General Office	10-13	11.9 – 13.5 = 11.3 adjusted	512m²	40 – 45
E(g)(iii) (formerly B1c) Light Industrial	47	55.8	3,333m²	54
Total				484 – 558

# Appendix A13. Unresolved objections to the most relevant ANP policies

As summarised from the submitted Consultation Statement

NP policy	Policy objections	Response
Policy 1.	Not all properties require a front	Resolution considered unnecessary
Settlement	garden, and some variation can be	The policy does recognise the
pattern, layout	positive.	possibility of exceptions, but it will be
and densities		down to the applicant to provide
		clearly justification of the mitigating
		circumstances why varying from the
		guidance is appropriate in that
		location.
	The phrase "strong rhythm within the	Resolution proposed
	areas of planned development" is not	This can be clarified by including the
	clear enough for a planning policy.	word 'repetition' and making clear
		that this is in regard to layouts.
Policy 6.	It would be unreasonable / unrealistic	Resolution proposed
Landscaping	to require the maintenance to last	Amendment suggested to reflect
	longer than 30 years. Consider	PINS model conditions which advises
	removing this requirement for	a period of at least five years to
	lifetime maintenance from the policy.	enable satisfactory plant
		establishment and that this may be
		extended further to reflect the nature
		of the scheme.
	Need to consider that any trees	Resolution considered unnecessary
	provided will need to be managed,	The policy is not proposing the
	and therefore a blanket TPO on trees	imposition of a blanket TPO on any
	provided would not be appropriate.	sites / areas.
	Some areas of trees are managed for	
	a variety of reasons including	
	commercial timber.	
	The woodland corridor linking	Resolution considered unnecessary
	Cranborne Heath and Drove End	The area of woodland running in a
	should be recognised as of great	south-westerly direct from Drove End
	environmental importance and for	along the parish boundary is noted as
	potential heathland restoration.	a priority habitat (deciduous
	Links from this to the Avon Valley are	woodland) in the Natural England

NP policy	Policy objections	Response
	important wildlife corridors which	inventory. There are no proposals to
	should not be lost.	build in this location, and such
		woodlands that fall within the parish
		would be protected as a key
		landscape feature under Policy 17.
Policy 7.	The indicative housing target of 192 is	Resolution proposed
Meeting Local	in principle agreeable to Natural	This issue was raised by Natural
Needs –	England, however there could be a	England, and following discussions
Housing	shortfall in mitigation provision over	with Natural England and Dorset
	the plan period.	Council, amendments have been
		made to resolve this objection.
	Question whether the Surplus Store	Resolution considered unnecessary
	site should be included in the supply	Whilst the Surplus Stores site did
	calculations	stall, construction recommenced in
		late 2023 and the first homes are now
		at roof height (April 2024).
	The most recent planning strategy,	Resolution considered unnecessary
	the Reg.18 Plan identified a potential	The target of 192 included in the NP
	level of housing for Alderholt	takes into account a wide range of
	expressed as two possible options: 1.	factors as set out in the NP Appx 1. It
	around 300 new homes and 0.25ha	also happens to equate to the Reg 18
	commercial and 2. significant	target in the LP, but it should be
	expansion – comprising a series of	noted that the LP target applies for a
	sustainable urban extensions around	17 year period (i.e. 5 additional years)
	the settlement to create a self-	and therefore would be reduced if
	contained 'town' (to be quantified).	applied to the NP period of 2022-
	Appendix 2 of the Local Plan outlines	2034.
	a minimum 192 dwellings for	Dorset Council are supportive of the
	Alderholt, but with an asterisk noting	housing target, as noted in Appendix
	that there is an optional additional	1.
	site for the village. The NP should	
	make provision for more homes than	
	is currently proposed to be	
	considered to meet the Basic	
	Conditions in this regard.	

NP policy	Policy objections	Response
	Also comments made that the number of homes overall should be limited.	
	Question the need for the habitat	Resolution considered unnecessary
	regulation requirements to be	The Parish Council has been guided
	repeated within the NP.	by Natural England's advice on this
		matter.
	The approach will not provide the	Resolution considered unnecessary
	affordable housing required to meet	The 2019 household survey results
	local need identified in household	was based on a degree of speculation
	surveys. The proposed allocation will	and could include double counting.
	be unlikely to deliver any affordable	More recent evidence on affordable
	homes at all.	housing need was taken into account.
	Additional comments that developers	The reduced provision elsewhere was
	will not build any affordable housing	specific to those sites. The Parish
	(given reduction on recent sites due	Council has liaised closely with the
	to viability),	relevant landowners, who have
		confirmed that they have not
		identified any issues that would raise
		viability concerns or require a
		reduction in the amount of affordable
		homes proposed.
	The M4(2) requirement may result in	Resolution considered unnecessary
	space that may be used for storage or	As announced in July 2022, the
	living space being used for	Government intend to mandate the
	accessibility. Most people do not	current M4(2) (Category 2: Accessible
	need an M4(2) specification home. A	and adaptable dwellings) requirement
	proportion of 30-50% M4(2)dwellings	in Building Regulations as a minimum
	may be more practical.	standard for all new homes. This
		policy provides an interim
		requirement for this to be achieved
		where practicable.
	It is not considered appropriate to	Resolution proposed
	seek to restrict the open market	The policy as worded does contain a
	home mix in line with Table 1 as this	degree of flexibility, but is intended to
	will impact on the flexibility of	provide clear guidance on the broad

NP policy	Policy objections	Response
	developers in respect of individual	mix of homes expected based on the
	sites and in relation to the matter of	evidence available. In the absence of
	viability and changes in economic	there any obvious viability issues, it
	circumstances, and the policy should	remains appropriate for the policy to
	be worded to make clear that the mix	provide clear guidance on the
	of both affordable and open market	expected housing mix, but the
	homes is not prescribed / fixed.	supporting text has been amended to
		clarify that viability reasons may be
		used to vary the mix.
Policy 8.	Whilst the intentions behind the	Resolution proposed
The Village	policy are understood, it is uncertain	Supporting text amended to explain
"High Street"	how this will be assessed and what	the likely requirements in more detail,
	would be reasonable to expect.	based on the typical requirements of
	Having to future proof houses for	a premises falling within Class E (as
	conversion will have a negative effect	the main use class for most High
	on the character of the entrance to	Street premises).
	the village.	
	Daggons Lane is a poor location for	Resolution considered unnecessary
	new services and will likely encourage	Most of the existing provision is
	more car trips even by local residents	located along Daggons Road / Station
	given the distance of the location	Road and at the junction with
	from much of the housing in the	Ringwood Road, and it is this part of
	village. Furthermore, there is no	the village that formed its historic
	certainty that infill development will	base and continues to act as the
	create some sort of retail or	village centre / high street. Creating a
	commercial frontage, any infill which	'new' village centre away from this
	does occur is likely to be very small	area would not be on the main
	scale and will not deliver a	through route and would have little
	commercial element at all.	regard the village's historic character.
		Whilst it is accepted that this is an
		enabling policy to encourage such
		development and will depend on
		opportunities arising within this area,
		the policy highlights this potential,
		and if necessary further actions can

NP policy	Policy objections	Response
		be considered through a future
		review of the plan.
Policy 10.	The small level of employment	Resolution considered unnecessary
Meeting Local	proposed, coupled with the overall	There is no employment land target
Needs –	low level of growth, is very unlikely to	set for the area. The policy is
Employment	be achieved.	supportive of employment, and does
	Employment within / close proximity	not restrict development provided
	to Alderholt will allow it to maintain	that it is of a nature and scale
	itself as a self-contained community -	appropriate to its location. Given that
	the policy as currently proposed is too	Alderholt is not well connected and is
	restricted.	not identified for employment
		investment it is accepted that the
		scale of development likely to take
		place will depend on local
		entrepreneurs.
	Whilst broadly supported there were	Resolution proposed
	some concerns about potential noise /	Policy and supporting text to clarify
	light pollution and traffic impacts	that adverse environmental impacts
	from additional employment that	may include noise / light pollution.
	may be to the detriment of the rural	
	character of the area.	
Policy 11	It will be important to ensure that the	Resolution considered unnecessary
Revised Village	increased village envelope and	This issue was raised by Historic
Envelope	associated sites avoid causing harm	England. The advice on heritage
	to the historic environment.	matters has been followed, and the
		Conservation Team's responses were
		considered and where possible
		followed.
	Generally support, however the	Resolution proposed
	wording is a little confusing.	Policy wording amended
	Concerns about the loss of greenfield	Resolution considered unnecessary
	sites and that the village was already	If the Neighbourhood is to be
	'big enough'.	effective it has to be based on an
		understanding of housing need and
		seek to meet such needs.

NP policy	Policy objections	Response
Policy 16.	Objection to LGS5 (no reasons given).	Resolution considered unnecessary
Local Green		The landowner was consulted earlier
Spaces		and their previous points of objection
		were considered, but not deemed to
		be sufficient to delete the proposed
		designation.
	Objection to LGS10 (within the	Resolution considered unnecessary
	appeal site) as it forms part of a more	Appendix 2 of the ANP includes a
	strategic approach to the future	more detailed description of each site
	growth of Alderholt being promoted	and their reason for their designation.
	through the Local Plan making	Whilst the owner considers that this is
	process, and that it does not meet	an ordinary piece of land that is not
	LGS criteria as it is not demonstrably	particularly valued by the community,
	special to a local community or of	this is not a view shared by the
	particular significance.	respondents to the consultations.
	Additional LGS suggested for	Resolution considered unnecessary
	inclusion	The suggestions did not meet the
		NPPF criteria.
Policy 17.	There is no information on the	Resolution proposed
Key Landscape	prevention of light pollution and the	This issue was raised by Cranborne
Features	provision of good lighting. Both those	Chase National Landscape
	elements should be included in a NP	Partnership. Policy and supporting
	that adjoins an International Dark Sky	text amended to reference these
	Reserve.	points.
	Suggest addition of further views	Resolution considered unnecessary
	towards New Forest, along Ringwood	Additional views were previously
	Road and around Pressey's Corner	considered at the meeting in June
		2023 but not considered to merit
		inclusion. The policy does seek to
		protect and where possible reinforce
		the character provided by the winding
		hedge lined lanes, and mature oak
		trees that line the lanes around and
		approaching the village.

# Appendix A14. Consistency of the most relevant ANP policies with the NPPF

As summarised from the submitted Basic Conditions Statement

NP policy	NPPF: key paragraphs (summarized)	Consistency conclusions
Policy 1.	NPPF 128. Planning policies and decisions	These policies are based on
Settlement	should support development that makes	design code work undertaken
pattern, layout	efficient use of land, taking into account	by AECOM, which has been
and densities	a) the different types of housing needed,	reflected in the policies to
and	and the availability of land suitable for	ensure that the requirements
Policy 6.	accommodating it;	for the plan to be clearly written
Landscaping	b) local market conditions and viability;	are met. The requirement for
	c) the availability and capacity of	streets to be tree-lined is
	infrastructure and services and scope to	included in Policy 6
	promote sustainable travel modes;	
	d) the desirability of maintaining an area's	
	prevailing character or of promoting	
	regeneration and change; and	
	e) the importance of securing well-designed	
	and beautiful, attractive and healthy places.	
	NPPF 135. Requires planning policies and	
	decisions to ensure that developments: (a)	
	will function well and add to the overall	
	quality of the area; (b) are visually attractive	
	as a result of good architecture, layout and	
	appropriate and effective landscaping; (c)	
	are sympathetic to local character and	
	history, including the surrounding built	
	environment and landscape setting, while	
	not preventing or discouraging appropriate	
	innovation or change (such as increased	
	densities); (d) establish or maintain a strong	
	sense of place; (e) optimise the potential of	
	the site to accommodate and sustain an	
	appropriate amount and mix of	
	development (including green and other	
	public space) and support local facilities and	
	transport networks; and (f) create places	

NP policy	NPPF: key paragraphs (summarized)	Consistency conclusions
	that are safe, inclusive and accessible and	
	which promote health and well-being.	
	NPPF 136. Planning policies should ensure	
	that new streets are tree-lined, that	
	opportunities are taken to incorporate trees	
	elsewhere, and the long-term maintenance	
	of trees is secured wherever possible.	
	NPPF 139. Explains that development that	
	is not well designed should be refused,	
	especially where it fails to reflect local	
	design policies and government guidance	
	on design, taking into account any local	
	design guidance.	
Policy 7.	NPPF 60. To support the Government's	Policy 7 sets out how the
Meeting Local	objective of significantly boosting the	housing target for the area is
Needs –	supply of homes, it is important that	proposed to be met, and the
Housing	sufficient land can come forward where it is	house types to be delivered
and	needed to meet as much of an area's	including affordable housing.
Policy 11	identified housing need as possible.	The amount of housing reflects
Revised Village	NPPF 63. The size, type and tenure of	national policy requirements to
Envelope	housing needed for different groups in the	boost the supply of homes, and
	community should be assessed and	also takes into account the
	reflected in planning policies.	spatial strategy in the adopted
	NPPF 65. Provision of affordable housing	Local Plan. The Neighbourhood
	should not be sought for residential	Plan group has liaised with the
	developments that are not major	Council to understand the likely
	developments.	target as set out in the NP
	NPPF 66. Where major development	appendices.
	involving the provision of housing is	The housing mix broadly
	proposed, planning policies and decisions	conforms to both national and
	should expect at least 10% of the total	local plan policies.
	number of homes to be available for	The policy encourages
	affordable home ownership (subject to	dwellings to be designed to
	certain exemptions).	meet the higher M4(3) Building
	NPPF 82. In rural areas, planning policies	Regulations standard for
	and decisions should be responsive to local	wheelchair users, but does not
		set this as a requirement, in

NP policy	NPPF: key paragraphs (summarized)	Consistency conclusions
	circumstances and support housing	light of the higher costs of such
	developments that reflect local needs.	designs that could impact on
	NPPF 83. To promote sustainable	viability. This aligns with
	development in rural areas, housing should	footnote 52 of paragraph 135 in
	be located where it will enhance or	the NPPF which suggests that
	maintain the vitality of rural communities.	planning policies for housing
	Planning policies should identify	should make use of the
	opportunities for villages to grow and	Government's optional
	thrive, especially where this will support	technical standards for
	local services. Where there are groups of	accessible and adaptable
	smaller settlements, development in one	housing.
	village may support services in a village	The policy would not prevent an
	nearby.	Affordable Housing Exception
	NPPF 84. Planning policies and decisions	Site from coming forward,
	should avoid the development of isolated	should there be an unmet need.
	homes in the countryside (subject to certain	The proposed site allocations
	exemptions).	and more general policies on
	NPPF 135. Requires planning policies and	housing and employment have
	decisions to ensure that developments	taken into account their
	create places that are safe, inclusive and	potential to harm the setting of
	accessible and which promote health and	the Cranborne Chase National
	well-being, with a high standard of amenity	Landscape and the locally
	for existing and future users 52.	designated Area of Great
	NPPF 180. Planning policies and decisions	Landscape Value. No major
	should contribute to and enhance the	development is proposed in
	natural and local environment, by:	these areas, and no objection
	protecting and enhancing valued	has been raised by the
	landscapes; recognising the intrinsic	Cranborne Chase partnership in
	character and beauty of the countryside,	this respect. The village of
	and the wider benefits from natural capital	Alderholt is some distance from
	and ecosystem services.	the National Landscape
	NPPF 182. Great weight should be given to	boundary, and together with
	conserving and enhancing landscape and	the small scale of development
	scenic beauty in Areas of Outstanding	proposed should have
	Natural Beauty which have the highest	negligible impacts.
	status of protection.	

NP policy	NPPF: key paragraphs (summarized)	Consistency conclusions
Policy 8.	NPPF 88. Planning policies and decisions	The policy identifies an area
The Village	should enable: the sustainable growth and	where retail and other E class or
"High Street"	expansion of all types of business in rural	similar sui generis uses
	areas; the development and diversification	appropriate to a local centre
	of agricultural and other land-based rural	would be encouraged, including
	businesses; sustainable rural tourism and	through the design of new
	leisure developments which respect the	buildings within this area to be
	character of the countryside; and the	flexible to allow for potential
	retention and development of accessible	change to such uses. This is
	local services and community facilities.	broadly in line with both
		national policy.
Policy 10.	NPPF 88. Planning policies and decisions	The policy is broadly in line with
Meeting Local	should enable: the sustainable growth and	the Local Plan but looks to
Needs –	expansion of all types of business in rural	reflect the issues known to be
Employment	areas; the development and diversification	relevant to the local area and
	of agricultural and other land-based rural	the slightly less restrictive
	businesses; sustainable rural tourism and	approach taken in the NPPF.
	leisure developments which respect the	
	character of the countryside; and the	
	retention and development of accessible	
	local services and community facilities.	
Policy 11	See Policy 7	
Policy 16.	NPPF 105 – 107. Local communities can	The Local Green Spaces (LGS),
Local Green	give special protection to green areas of	have been considered against
Spaces	particular importance by designating land	the criteria established through
	as Local Green Space. This rules out new	NPPF and are considered to
	development other than in very special	meet the criteria. The wording
	circumstances. These spaces should be	of the policy is considered to be
	capable of enduring beyond the end of the	consistent with policy for Green
	plan period. The designation should only be	Belts (which references the
	used where the green space is in reasonably	need to preserve openness of
	close proximity to the community it serves;	the Green Belt and not conflict
	is demonstrably special to a local	with the purposes of including
	community and holds a particular local	land within it).
	significance; and is local in character and is	
	not an extensive tract of land. Local policy	

NP policy	NPPF: key paragraphs (summarized)	Consistency conclusions
	for managing development within a Local	
	Green Space should be consistent with	
	policy for Green Belts.	
Policy 17.	NPPF 180. Planning policies and decisions	The policy supports a more
Key Landscape	should contribute to and enhance the	detailed understanding of the
Features	natural and local environment, by:	key features that are important
	protecting and enhancing valued	to local landscape character,
	landscapes; recognising the intrinsic	and ensures that these features
	character and beauty of the countryside,	are protected and enhanced.
	and the wider benefits from natural capital	
	and ecosystem services.	
	NPPF 191. Planning policies and decisions	
	should identify and protect tranquil areas	
	which have remained relatively undisturbed	
	by noise and are prized for their	
	recreational and amenity value for this	
	reason; and limit the impact of light	
	pollution from artificial light on local	
	amenity, intrinsically dark landscapes and	
	nature conservation.	

# Appendix A15. Dorset Council Regulation 14 Consultation Response

**Dorset Council response** 

19 January 2024

## Summary

Dorset Council welcomes progress of the Alderholt neighbourhood plan. We are pleased to see that many of our comments on previous drafts have resulted in improvements to the plan and that currently we have no fundamental concerns with the plan. The comments provided below are intended to be constructive and to help with finalising the plan ready for submission and examination. Comments are from the Community Planning Team unless otherwise specified.

Section / paragraph	Comments	
Diagram on page 3	The diagram misses the Regulation 16 consultation which provides a second	
And Para 1.2.10	opportunity for public consultation after the plan has been submitted but	
	before the plan goes to the examiner. This detail is also missed from para	
	1.2.10	
Map 3 on Page 12	As Policy 1 relies on this map, it would be useful if the areas weren't hatched or	
	at least not hatched so heavily as it makes it very difficult to view the details of	
	the base map underneath (necessary to understand where the boundaries of	
	the character areas are).	
Para 2.1.6	Regarding Camel Green Road being unpaved, I note that it, and roads leading	
	off it, are unadopted highway, and therefore their maintenance is the	
	responsibility of the residents. It might be useful to note this, as it explains why	
	there is a difference in maintenance and road surfaces.	
Para 2.3.7	I'm not sure I'd agree that all the bungalows at the end of Apple Tree Road are	
	of a unique style – there appear to be two distinct designs.	
Para 2.4.1	Suggest changing first sentence to "other than sites that <u>are</u> allocated for	
	development" to give greater certainty. (Otherwise someone might argue	
	that an unallocated site could be developed before it is allocated.)	
Para 3.1.5	I think this should refer to Map 9 (not Map 8)	
Policy 1	Noted and supported – although see comments above regarding making Map	
	3 clearer.	
Para 3.2.3	Typo "should be design <u>ed</u> "	
Para 3.2.4	Typo " <u>and</u> street trees in well-designed pits"	
Policy 2	Noted and supported	
Policy 3	Comments from the Transport Planning Team	
	The Neighbourhood Plan should refer to the inclusion of secure cycle	
	parking/storage in either Policy 3 or referenced in the sites allocated for	
	development. This is to help encourage cycle use for residents.	
Para 3.4.2	Just to note, repetition can be attractive. The Royal Crescent in Bath is often	
	cited as an example, but many desirable historic streets feature repetition of	

Section / paragraph	Comments	
	design, with this approach copied in new developments such as Poundbury.	
	However, I appreciate that you may be looking for a more organic approach in	
	a village.	
Para 3.4.4	This paragraph is a little confusing. It seems to be describing a policy, however this isn't reflected in Policy 4 below. The final paragraph of Policy 4 talks about discretely placing meter boxes, etc. A key difference is that the Policy doesn't mention solar panels. Policy 5 talks about support for solar panels that are in keeping with "local character", whereas para 3.4.4 talks about "the character of the building".  From reading the rest of the plan, it is clear that the majority of the village is fairly recent (1970s onwards), and therefore I'm not sure that modern-day features (such as meter boxes and solar panels) would feel out of place. While some features, such as meter boxes, can be placed discretely, I'm not so sure about solar panels. I think that given the wider environmental benefits that solar panels afford (silent, green energy), a bit of visual disruption has to be tolerated, particularly away from listed buildings and conservation areas.  Paragraph 164 of the latest NPPF (Dec 2023) tells us to give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings (including through installation of heat pumps and solar	
	panels). Also bearing in mind the neighbourhood plan basic condition of contributing to the achievement of sustainable development, I suggest that you could have a policy that generally supports solar panels rather than	
Delieur	seeking to restrict them.	
Policy 4	Noted and generally supported.	
Policy 5	Noted and supported. We suggest that the NP could also refer to the Sustainability Guidance and Checklist that Dorset Council has recently published, and from 15 January 2024 is a requirement for planning applications. <a href="https://www.dorsetcouncil.gov.uk/-/planning-for-climate-change">https://www.dorsetcouncil.gov.uk/-/planning-for-climate-change</a>	
Para 3.6.6	Regarding existing and potential wildlife corridors, we suggest referring to the	
	Eco-networks produced by DERC and shown on Dorset Explorer.	
	Regarding biodiversity net gain, generally only householder applications and very small applications (less than 25 sqm) are going to be exempt from BNG.  Details of exempt developments can be found here: <a href="https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments">https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments</a>	
Policy 6	Regarding the final paragraph which requires BNG to be maintained for the	
	lifetime of the development. The lifetime of development could easily be 100+ years. Legislation requires BNG to be maintained for at least 30 years and this will be secured through a legal agreement.	
	https://www.gov.uk/guidance/understanding-biodiversity-net-gain	
	I think it would be unreasonable / unrealistic to require the maintenance to last longer than 30 years. Therefore I suggest removing this requirement for lifetime maintenance from the policy.	

Section / paragraph	Comments
Para 4.1.2	Suggest changing "the main Council's policy" to "the Council's main policy" for clarity.
Para 4.1.4, 4.1.19,	There are several references in the document to household surveys undertaken
4.1.30, 5.1.1	in 2017 and 2019 (before work on the neighbourhood plan began). No
	explanation is given about who undertook these surveys until Appendix 1 (para A1.7). These references are therefore confusing for anyone reading the plan from front to back.
	If the results of these surveys have been used in the formulation of the plan, it might be useful if they could be mentioned in the introduction (under 'What
	has happened so far'), more clearly referenced with footnotes, and links
	provided in Appendix 4 (Supporting Documents) to where the survey results
	can be viewed. However, if the survey results haven't been used to formulate
	policy, it might be sensible to remove these references in order to make the plan clearer and shorter.
Para 4.1.8 and Policy 7	Comments from the Housing Enabling Team
,	Para 4.1.8 of the plan states, "A more accurate picture of local need for
	affordable rented home sizes should be determined through a review of the
	housing register at the time an application is prepared." If the Neighbourhood
	Plan omits 4 bedroom houses this could be used at an argument to not provide
	them. Currently we have 242 households requiring 4 bedroom homes on the
	housing register with many large families stuck in temporary accommodation
	due to the limited amount of four bedroom houses being delivered.
	It should include a mix of 1,2,3 and 4 bedroom units to be determined through
D	a review of the housing register at the time an application is prepared.
Para 4.1.15 on page 37	"over-wintering birds" not "bords"
Policy 7	Noted and supported.
Policy 8	Appreciate the intentions behind the policy but have reservations about how reasonable or effective it will be, in particular requiring new residential
	development to be convertible to retail and requiring it to provide suitable
	customer parking. What does this mean in practice? Does there have to be a
	front room with a minimum floorspace and shopfront type window? What is
	meant by suitable customer parking for a business that doesn't exist. These are
	not necessarily objections, just practical considerations which will legitimately
	be asked.
Policy 9	Noted and supported.
Policy 10	Noted and supported.
Para 4.2.2	"The village envelope has been updated to include these sites Whilst these
	<b>extant sites</b> are not included as specific allocations" – it is confusing in this
	context what is meant by "these extant sites". I know it is the sites labelled as
	"existing permission" on Map 10, but this needs to be made clearer in this
	paragraph as without further explanation it appears to be referring to the sites
	listed directly above. A table of extant sites is provided below A1.23 – you
	could to refer to that or copy the table into this section.
	cools to refer to that or copy the table lift till section.

Section / paragraph	Comments
Policy 11	Generally support, however I find the wording confusing. The policy appears to
	be saying that the revised village envelope defines the extent of the smaller
	hamlets, which I don't think is the case. I think the situation is that village
	envelope defines the extent of the main village, and everything else in the
	parish is classed as 'countryside'.
Policy 12	Noted and supported.
Para 4.2.14	The paragraph says that commercial uses can be provided both adjoining the
	garage site and along the road frontage, however Policy 13 appears to say that
	employment uses should be on the road frontage only.
Policy 13	Noted and supported.
Para 4.2.15	"Which is not currently shown as adopted highway" – would it be more
	accurate to simply say "which is not currently adopted highway"? Do you know
	if there are plans for the highways authority to adopt this road?
Para 4.2.18	Refers to "9 Blackwater Close" but I think this should be "9 Blackwater Grove"
Policy 14	Noted and supported.
Policy 15	Noted and supported.
Policy 16	Noted and supported.
•	I believe that the following sites are owned by Dorset Council:
	LGS6 – Tudor Close amenity area
	LGS7 – Kestrel Way amenity area
	LGS8 – Windsor Way kickabout area
	<ul> <li>LGS9 – Alderholt School playing field</li> </ul>
	The Assets and Property team have been consulted and have no objections.
Policy 17	Noted and supported.
Table 2 (page 53), V1	Just to note that this refers to "the iconic block of conifers" – can I check
1 5 557	whether this contradicts Policy 17, which describes conifer plantations as a
	detracting feature?
Policy 18	Noted and supported.
Policy 19	Noted and supported.
, 3	"Features associated with railway" – should this read "Features associated with
	the former railway"?
Other	Comments from the Transport Planning Team
	Due to the scale of development included with the Neighbourhood Plan, there
	is limited scope to improve facilities and transport links. However, we would
	push that the Neighbourhood Plan maximises the opportunity to secure
	developer funding from the allocated sites to contribute towards local
	transport improvements. This could include contributions towards community
	transport, where feasible, and/or towards The Trailway Project.
SEA report	Environmental Assessment Officer comments
•	The scope of my review of the SEA was to check whether it meets the statutory
	requirements of Directive 2001/42/EC on the assessment of the effects of
	certain plans and programmes on the environment ('SEA Directive'), which is
	transposed into UK law through the Environmental Assessment of Plans and

Section / paragraph	Comments
	Programmes Regulations 2004 ('SEA Regulations'). The Basic Conditions require conformity with this legislation, since there is a requirement that the making of the plan "does not breach, and is otherwise compatible with, EU obligations".  My review didn't pick up any non-compliance issues, as the requirements of Annex II of the Habitats Directive and Regulation 12(3) and Schedule 2 of the SEA Regulations have been met. AECOM have written the reports which are thorough and prepared to a high standard, as expected. However, the SEA process is iterative and we would require there to be further assessment undertaken at the later stages of the plan preparation process and updated SEA reports. This is noted by AECOM in the 'Next Steps' section though, presented in para 6.64 onwards, so I am confident that this will be undertaken. My only comment at this stage is that I would perhaps like to see more explanation of the reasons for selecting/rejecting each of the nine sites considered in the analysis of reasonable alternatives when it comes to the final Environmental Report. Some explanation is provided in para 5.15, but I would expect more specific reasons for each individual site. The assessment of reasonable alternatives is the part of the SEA most susceptible to legal challenge, and so it's important to be as thorough and precautionary as possible here.
HRA Report	Environmental Assessment Officer comments  AECOM have submitted an HRA report with the purpose of providing Dorset Council with the information to inform the HRA.  Once again, the report is thorough and high quality, as expected from AECOM. However, there are a couple of minor issues which need correcting, including:  • the suggested mitigation for the New Forest recreational pressure issue, which comprises a change in wording to policy 7, doesn't reflect the most recent progress which has been made with developing a SAMM strategy for the New Forest. This is probably because the SAMM strategy is still in progress, and isn't public at this stage.  Therefore it's more a case of AECOM not being aware of what's happening behind the scenes understandably, rather than an oversight on their part; and  • the air quality section doesn't have regard to the Dorset Heathlands Interim Air Quality Strategy despite the proximity to the Dorset Heaths.  Note that our environmental assessment officer (Oliver Rendle) has contacted James Riley at AECOM directly regarding the identified issues with the HRA.

## Appendix A16. Appeal decision APP/Q3630/W/20/3253944.



# **Appeal Decision**

Site visit made on 2 September 2020

#### by S R G Baird BA (Hons) MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government Decision date: 21 October 2020

## Appeal Ref: APP/Q3630/W/20/3253944 Land off Rosemary Lane, Thorpe, Surrey TW20 8PH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is made by Simco Homes & Careys New Homes against the decision of Runnymede Borough Council.
- The application Ref RU.18/1838, dated 31 October 2018, was refused by notice dated 30 December 2019.
- The development proposed is for the erection of up to 83 dwellings and associated access.

This decision is issued in accordance with Section 56(2) of the Planning and Compulsory Purchase Act 2004 (as amended) and supersedes the decision issued on 16/9/2020.

#### Decision

1. The appeal is dismissed.

#### **Preliminary Matters**

- The application was submitted in outline with all matters other than access reserved. The application included a sketch layout showing 83 dwellings, which for the purposes of this decision is treated as being illustrative only.
- 3. Reasons for Refusal (RfR) 1 and 8 refer to conflict with the Runnymede Borough Local Plan Second Alteration 2001 where the site was in the Green Belt. The Runnymede 2030 Local Plan (LP) was adopted in July 2020 and the site removed from the Green Belt. As such RfR 1 and 8 are not relevant.

#### **Main Issues**

- 4. These are:
  - whether the proposal would prejudice the preparation of the Thorpe Neighbourhood Plan by pre-determining decisions about the scale and location of development;
  - 2. whether there is enough detail to allow access to be determined now;
  - 3. the implications for biodiversity;
  - 4. the effect on the setting of West End Farm, a Grade 2 Listed Building;
  - whether the proposed development would provide an acceptable living environment for prospective residents with reference to traffic noise;
  - 6. whether the site can be adequately drained;

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whether the proposal would represent a sustainable, high-quality development.

#### Reasons

Issue 1 - Prematurity

- 5. Prejudice to the preparation of the Thorpe Neighbourhood Plan (TNP) is not a reason for refusal. However, it is a matter at the forefront of representations made by the Thorpe Neighbourhood Forum, the Residents Association and numerous individuals. The objective of neighbourhood planning is to give communities the power to develop a vision for and shape the development of their area. Amongst other things, Neighbourhood Plans enable a community to choose where it wants new homes to be built, what they should look like and what infrastructure should be provided. Neighbourhood planning is a key part of the development plan process and it is important that the community retains confidence in the process and their ability to shape their neighbourhood.
- 6. LP Policy SD1 and Table 3 outline the spatial development strategy for and distribution of housing growth over the plan period. The expected minimum growth delivery for Thorpe is listed as 89 net additional dwellings with the scale and location of these dwellings dealt with by a Neighbourhood Plan.
- 7. One objective of the TNP is to ensure the village setting is maintained particularly on its western edge through a buffer between the village, the Thorpe By-Pass and M25. The TNP allocates 3 sites for residential development with a minimum of 74 dwellings in total. Policy TH2(i) allocates the appeal site for some 24 dwellings and public amenity space. The concept drawing for this allocation shows the western edge of the site as amenity space, the dwellings positioned towards the eastern side of the site and vehicular access from Rosemary Lane.
- 8. The National Planning Policy Framework (Framework) paragraphs 49 and 50 set the context for considering the timing and limited circumstances when a proposal may be considered premature. Framework paragraph 50 indicates that a refusal on the grounds of prematurity will seldom be justified before the end of the Regulation 16 publicity period on the draft plan. Here, the TNP was submitted to the Council in June 2020, the consultation period ran until mid-August and it is envisaged that the TNP will be examined in September 2020 with a referendum to be held in mid-2021. Accordingly, the TNP is at an advanced stage of preparation. Given the scale of the proposal and the conflict with Policy TH2(i), the proposal would be so substantial, and its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions.

Issue 2 - Access

9. The means of access to the site from the public highway is shown through a series of drawings that form part of the Transport Assessment (TA) and the illustrative layout submitted with the application. In line with the requirements of the Highway Authority (HA), the TA shows, that vehicular access to the site for all but 3 of the proposed dwellings would be via a new access onto the Thorpe By-Pass. Rosemary Lane to the east would be closed to vehicular traffic. Coltsfoot, which has an existing vehicular access onto Rosemary Lane,

- would be demolished, the access closed and used solely for pedestrians and cyclists. The HA has no objection subject to the imposition of conditions.
- 10. The access from the by-pass, the widening of Rosemary Lane up to the site access and the works to close off Rosemary Lane to the east all are within the site or the public highway. Similarly, the proposed off-site works to improve footpath provision to the east of Rosemary Lane and at the junction with The Bence appear capable of being implemented within the highway. As such there is no reason to conclude that these works could not be implemented. Indeed, it is hard to imagine that the HA would have posted a lack of objection if that were not the case. Most of the dwellings within the site would be served by a shared-surface highway. Given that the alignment of this road would be determined by the layout of the development, a reserved matter, there are no details other than the illustrative plan. However, the site is large enough size to accommodate residential development and internal servicing.
- 11. The site is crossed by 2 public footpaths, FP53 running from Rosemary Lane in the north to the south-west corner of the site and west across the by-pass and FP52 running east from Rosemary Lane (between Coltsfoot and May Rana) to join FP53. The illustrative layout shows the footpaths within the site diverted along the proposed estate roads and using the line of the former driveway to Coltsfoot as the pedestrian and cycle link to Rosemary Lane in the north. The existing line of FP52 where it passes between Coltsfoot and May Rana is narrow and given its appearance and condition looks as though it is rarely used. Pedestrians accessing the public footpath network use an informal link created from FP53 through woodland on the edge of the Frank Muir playing fields. The illustrative layout provides that this link could be maintained if desired.
- 12. Drawing the above together, the proposal is accompanied by enough detail to enable access to be determined now. Precise details of the construction of the accesses and off-site highway improvements are matters that could appropriately be dealt with by condition.

#### Issue 3 - Biodiversity

- 13. The Framework and LP Policy EE9 seek a net gain for biodiversity. Planning Practice Guidance¹ (PPG) defines biodiversity net gain as works which deliver "measurable improvements... by creating or enhancing habitats in association with development." The application included a Preliminary Ecological Assessment (PEA) and an Emergence and Activity Bat Survey. The PEA concludes that whilst the site is of low ecological value, some of the buildings to be demolished contain bat roosts and mitigation measures were recommended. Other than these measures, the proposal does not consider biodiversity net gain.
- 14. The site is within the 5km zone of influence of the Thames Basin Heath Special Protection Area (SPA). Research shows that new dwellings within this zone are likely to generate additional recreational activity, causing disturbance and damage to the habitat resulting in a significant impact on the integrity of the SPA. Thus, without mitigation, the proposal would adversely affect the integrity of the SPA. Natural England and the Council have in place established mitigation measures and subject to a financial contribution being secured, suitable mitigation can be provided. Accordingly, the appeal proposal would

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<sup>&</sup>lt;sup>1</sup> Natural Environment - Paragraph 022, Reference ID: 8-022-20190721

- not have an adverse effect on the integrity of the SPA and would not conflict with LP Policy EE10.
- 15. Notwithstanding my conclusion on the effect on the integrity of the SPA, the proposal, in the absence of a consideration of biodiversity net gain, conflicts with the objectives of LP Policy EE9 and the Framework.

Issue 4 - Heritage

- 16. The proposal includes land to the immediate west of West End Farm, a Grade 2 Listed Building (LB). LP Policy EE4 indicates that development within the curtilage or within the vicinity of a LB, should preserve and/or enhance its setting and any features of special architectural or historical interest which it possesses. Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that special regard is paid to the desirability of preserving the setting of a LB.
- 17. The RfR asserts that the development, by reason of its position and scale, would result in substantial harm to the setting of the LB. Setting itself is not a heritage asset (HA) or designation, rather its value is in what it contributes to an asset's significance or the ability to appreciate that significance. Significance is defined as the value of a HA to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Notwithstanding Framework paragraph 190, the Council's conclusion that the development of the land to the west would result in substantial harm, which is a high test, is unsupported by any assessment of the significance of the LB or the contribution the setting has to its significance.
- 18. The significance of West End Farm is derived largely from its architectural and historic interest as a 16<sup>th</sup> century former farmhouse albeit it appears to have been significantly altered and extended since then. As a former farmhouse, the open land to the west, north and south contributes to its historic significance. However, given the existing enclosure of the building with its high walls, the extent of that setting is restricted to a limited area to the north, south and west. Given the proposal is to develop land immediately to the west of the LB, inevitably there would be an impact on its setting. However, the layout plan on which the Council bases its decision is illustrative with scale, appearance and layout being reserved matters. In these circumstances, the effect on West End House could be mitigated through careful layout and design such that the effect would fall within the spectrum of less than substantial harm.
- 19. Framework paragraph 196 indicates that in such circumstances, the harm is to be weighed against the public benefits of the scheme. The provision of affordable housing, the economic benefits to the settlement of inward investment and the contribution residents would provide to the viability of existing community and commercial facilities are public benefits, which here, would outweigh the less than substantial harm identified.

Issue 5 - Noise

20. The site is located adjacent to the Thorpe By-Pass and the M25. The Framework and LP Policy EE2 seek to ensure that noise does not give rise to significant adverse impacts on health and the quality of life. The appellants' Noise Impact Assessment (NIA) acknowledges that dwellings and gardens on the western side would be subject to high levels of daytime noise. The

application is in outline and the quantum, layout and construction of the dwellings are all reserved for subsequent applications. In this context, notwithstanding the high-risk status of the site, it is clear from the NIA that with careful design and layout development could take place in a way that would not result in unacceptable living conditions for residents through noise.

#### Issue 6 - Surface Water Drainage

21. The submitted Flood Risk Assessment and Development Drainage Strategy considered infiltration as a way of disposing off the surface water run-off. However, the site is located within a Groundwater Source Protection Zone where the Chertsey Pumping Station provides a public water supply from abstraction boreholes. Here, direct infiltration of surface water drainage is not recommended to avoid contamination to the water supply. Moreover, on-site testing indicates that ground conditions unsuitable for an infiltration-based drainage strategy. Thus, the proposal is not supported by a workable surface water drainage strategy. In these circumstances, the Lead Local Flood Authority (LLFA) recommended the refusal of planning permission. Whilst there may be a solution to the issue of surface water disposal, given the importance of the site within the groundwater protection zone, it would be inappropriate to grant permission without an indication of a working scheme. As such, the proposal would conflict with the objectives of LP Policy EE13.

#### Issue 7 - High Quality and Sustainable Development

- 22. In relation to this RfR, the Council appears to row back from the relevance of directing traffic away from Rosemary Lane. LP Policy SD1 indicates that the District's growth aspirations will largely be directed towards the most sustainable larger settlements. These are considered the best locations for delivering supporting infrastructure as well as active and sustainable travel choices. Thorpe is listed as a settlement that could accept additional development. Thus, by definition, Thorpe is recognised by the LP as a sustainable location for development and whether a proposal directs traffic away from roads within the village has nothing to do with the sustainability of Thorpe as a location for development.
- 23. Thorpe has developed and extended over time with a variety of house types, designs and densities such that there is no distinct character or design cues that a development should follow. That said, in preparing the Design and Access Statement, the appellants have sought to reflect examples of design, layout and density found elsewhere. Moreover, layout and appearance are reserved matters, where the Council would have further control.
- 24. The Council suggests that the site layout "...would not look inward to the village or become an integral "organic" addition to it." However, those assertions fail to recognise, the access realities of the site and the relationship of the site to the settlement. On access, the HA makes it clear that Rosemary Lane is substandard and the junction with Green Lane, currently the only way out to the south, is severely substandard such that "...any additional transport load at this point would be unacceptable." The existing dwellings on Rosemary Lane to the north-east of the site and their densely planted gardens and boundaries create a physical and visual boundary to the rest of the settlement. In this context it is hard to envisage any development of this site being able to be organic and inward looking. Moreover, to achieve the TNP's objective of a development of 2 and 3-bedroom houses with a focus on first-time buyers and

- rented accommodation any development would need to display higher densities than the settlement in general.
- 25. Drawing the above together, albeit all matters, other than access, are reserved, the illustrative scheme would reflect a high-quality sustainable development consistent with LP Policy EE1.

Planning Balance

26. Notwithstanding my conclusions on matters of: access; the effect on the SPA; heritage; noise; sustainable development and the economic and social benefits that would flow from this development, these matters are outweighed by the prejudice to the preparation of the Thorpe Neighbourhood Plan and the absence of detail regarding biodiversity net gain and surface water drainage. In these circumstances, the proposal would conflict with the objectives of the development plan when taken as a whole and the appeal should be dismissed.

#### Other Matters

27. The Council identifies 4 areas that require securing by a Planning Obligation. These are: mitigation measures in respect of the SPA; early and primary years education contributions; affordable housing and outdoor sport and recreation facilities. The appellants have submitted draft Heads of Terms in relation to the first 3 of the requested obligations and make no reference to the fourth. However, no Obligation has been submitted and as the appeal is being dismissed for other reasons, these are matters that do not need to be pursued.

#### Conclusions

28. For the above reasons and having taken all other matters into consideration, this appeal is dismissed.

George Baird

Inspector

## Appendix A17. Appeal decision APP/Q3305/W/21/3280802



# Appeal Decision

Inquiry Held on 7-10 December 2021 Site visits made on 6 and 10 December 2021

#### by David Reed BSc DipTP DMS MRTPI

an Inspector appointed by the Secretary of State

Decision date: 10 February 2022

## Appeal Ref: APP/Q3305/W/21/3280802 Land at Hoecroft, Chilcompton, Wells, Somerset

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
- The appeal is made by Gladman Developments Ltd against the decision of Mendip District Council.
- The application Ref 2021/0421/OTS, dated 18 February 2021, was refused by notice dated 30 July 2021.
- The development proposed is the erection of up to 95 dwellings with public open space, landscaping and sustainable urban drainage system.

#### Decision

1. The appeal is dismissed.

#### **Preliminary Matter**

 The application is in outline with all matters reserved except access. However, an illustrative Development Framework Plan was submitted to show how a scheme might look on the site with peripheral landscaping and native woodland planting in the south-east corner. The appeal has been considered taking this illustrative plan into account.

#### **Main Issues**

- 3. The application was refused for five reasons, however three were resolved before the inquiry. These related to the potential impact on certain bat species, concerns regarding resource efficiency/climate change and the lack of a legal mechanism to secure affordable housing and infrastructure. The latter has been addressed through a Section 106 agreement which was submitted at the inquiry.
- 4. The main issues therefore are:
  - whether the proposal complies with the spatial strategy of the development plan;
  - the effect of the proposal on the character and appearance of the area, including the form of the village and landscape impacts; and
  - whether the services and facilities of the village are able to accommodate the quantum of housing proposed.

#### Reasons

#### Spatial strategy

- 5. The proposal is for a housing development of up to 95 dwellings. The site lies immediately adjacent to but outside the 'development limits' of Chilcompton as defined by the Mendip District Local Plan Part 1 adopted in December 2014 (the LPP1). It follows that the site lies in the countryside for planning policy purposes and the proposal conflicts with LPP1 Core Policies (CP) 1, 2 and 4 which in turn set the district's spatial strategy, the housing provision to be made and the policy for sustaining rural communities.
- 6. CP1 seeks to deliver the most sustainable pattern of growth for Mendip district by directing the majority of development towards the five main towns. In the remaining rural parts of the district development will be 'tailored to meet local needs' with the villages divided into a hierarchy with three categories, primary villages, secondary villages and more minor villages and hamlets. Chilcompton is classified amongst the 16 primary villages on the basis that they offer key community facilities, including the best available public transport services, and some employment opportunities, making them 'best placed to accommodate most rural development'. For the scale of housing to be provided within the various villages reference is made to the table associated with CP2.
- 7. CP2 provides for a minimum of 9,635 additional dwellings in the district over the plan period 2006-29, some 420 dpa. Strategic sites are identified for the five main towns with provision in the villages confined to their development limits and smaller sites to be allocated in the subsequent Mendip Local Plan Part 2 Sites and Policies (the LPP2). Importantly, further allocations are to be based on the principle of 'proportionate growth' in each settlement with the contribution or requirement for each village set out in the associated Table 9. CP4 also provides that housing within rural settlements should be at a scale commensurate with the existing housing stock in line with CP1 and CP2.
- 8. LPP1 paragraphs 4.18 to 4.34 and its associated technical paper set out a 'top down' approach to distributing the 9,635 additional dwellings firstly to the main towns and then in turn to the primary and secondary villages. The calculation equates to a 15% growth in housing stock for each village over the plan period 120 in the case of Chilcompton subject to a maximum requirement for any primary village of 70 dwellings. Table 9 sets out the requirement for each village over the 2006-29 period, 70 dwellings in the case of Chilcompton. As this figure was already exceeded with 78 dwellings built or committed at the time, no further development was proposed.
- 9. The LPP2, finally adopted in December 2021, as only a subsidiary plan, did not review the strategic policies of the LPP1 but identified additional housing sites to meet its minimum requirements and to support housing land supply with a view to enabling an uplift in housing growth. The result is a revised housing provision in Table 4a of 12,755 dwellings over the 2006-29 plan period, some 555 dpa. This is an increase of 32% over the CP2 figure and obviously of some assistance to housing land supply going forward. The LPP2 makes a series of allocations totalling 305 dwellings in villages but nothing at Chilcompton as by then 156 dwellings had been built or committed, significantly more than the LPP1 'planned level' of 70¹. The largest allocations at primary villages are 70

<sup>&</sup>lt;sup>1</sup> LPP2 Chapter 11.6

- dwellings at Nunney and 40 dwellings at Westbury Sub Mendip which address the LPP1 Table 9 shortfalls of 54 and 40 dwellings respectively. No allocations of the scale of 95 dwellings are made, the size of the scheme in this case.
- 10. However, in the absence of a review of the LPP1 as required by paragraph 33 of the National Planning Policy Framework (NPPF), five years have elapsed since adoption<sup>2</sup>. The housing requirement should now be assessed by the standard method of calculating local housing need, some 599 dpa, rather than the CP2 figure of 420 dpa. Due to this additional requirement, it is agreed that the Council can currently only demonstrate 3.5 years supply of deliverable housing land. It follows that Policies CP1, CP2 and CP4 are out of date insofar as they restrict new housing. The presumption in favour of sustainable development (the tilted balance) in paragraph 11(d)(ii) of the NPPF therefore applies. This is an important material consideration to be taken into account in determining this appeal.
- 11. Since the housing provision in CP2 is out of date, the detailed way in which the figure would be made up is also out of date. The guideline of 15% growth in housing stock in each rural settlement and 'village requirement' for just 70 dwellings in Chilcompton therefore cannot be decisive in this case. However, the basic principles of CP1, CP2 and CP4, that the majority of development should be in the five towns, that the primary villages are the most sustainable in the rural area and that their individual growth should be proportionate, do not conflict with the NPPF, remain valid and should be given significant weight. Indeed, the appellant does not seriously dispute these principles.
- 12. The appellant argues that Chilcompton is the most sustainable primary village and thus the most suitable for growth. According to the Rural Settlement Role & Function Paper it has the second highest population, is the only village with all the services and facilities surveyed, has a journey to work bus service, a high ratio of jobs to households, few specific constraints, and the highest overall sustainability score of 20 points. However, the report dates from 2012, uses 2001 census data, and has not been updated. Various changes including the number of jobs and bus service alterations were discussed at the inquiry. With Beckington, Evercreech, Draycott and Nunney on 18 or 19 points in 2012 the village may no longer be the most sustainable. In particular, the ability of the primary school to accept additional children is a major factor.
- 13. The 'requirement' for only 70 dwellings in Chilcompton over the plan period was arbitrary even when set. The latest figure of 171 dwellings built or committed, or 266 dwellings with the scheme, does not in itself demonstrate whether its growth would be proportionate. However, 171 dwellings amounts to a 22.4% increase over the 2006 housing stock of 762 and the scheme for 95 more would result in a 35% increase, significantly more than the guideline figure of 15%. Whilst the appellant notes that Beckington and Norton St Philip will see higher growth in their housing stock of 38.8% and 43.9% respectively (including their LPP2 allocations), the absolute number of extra houses in those villages will be much lower. Most villages will see significantly lower levels of growth, several well below 15%.
- 14. The appeal scheme would not significantly increase the proportion of new housing to be provided in rural areas above the 20% proposed in the LPP1, but no single scheme would. Expressing the 35% increase in households in

<sup>&</sup>lt;sup>2</sup> To address this, LPP2 Policy LP1 requires an immediate review of both the LPP1 and LPP2.

- Chilcompton as 1.5% per annum also sounds modest, but this disguises the rapid increase that would occur in just two or three years as the scheme is built out. The population would increase by about 9.4% over that short period.
- 15. In conclusion, were the scheme to go ahead, Chilcompton would be at the leading edge of village growth during the plan period. There are no examples of single schemes of the size of 95 dwellings elsewhere and the scheme would not be 'small' in line with LPP2 paragraph 3.28. The scheme would therefore skew the spatial strategy of the development plan away from the main towns and deliver a less sustainable pattern of growth for Mendip district than the LPP1 intends<sup>3</sup>. However, unless repeated in other villages, it would not seriously undermine the strategy overall and would amount to limited harm. Ultimately, the more important issue is whether the proposal would be a disproportionate or inappropriate addition to Chilcompton. This cannot be determined mathematically but depends on an assessment of the scheme in relation to the village concerned.

#### Character and appearance

- 16. The housing development of up to 95 dwellings would take the form of a culde-sac estate accessed from Hoecroft, a semi-rural lane on the outskirts of the village forming part of the B3356 which runs south-east from Naish's Cross. The appeal site of about 4.65 ha comprises two gradually rising fields used for grazing purposes, bounded by well-trimmed hedges and occasional hedgerow trees. Existing residential properties fronting Stockhill Road and Hoecroft Gardens lie to the west and north whilst others on Hoecroft face the proposed access and one, Croft House, projects into a corner of the site.
- 17. The application was accompanied by a Landscape and Visual Impact Appraisal (LVIA) from Aspect Landscape Planning Ltd and at appeal stage this was supplemented by further evidence from the appellants and a detailed critique by Potterton Associates Ltd. The evidence included a series of viewpoints in the local area and five wireframe visualisations. This material, together with discussion at the inquiry, provided a full airing of the issues.
- 18. The village has a distinctive layout and position within the landscape, being elongated in form along the east-west B3139 road with long linear extensions to the north along The Street and south west along Stockhill Road. The built-up core of the village lies between the B3139 and the old railway line, where there is some commercial land and a small number of medium sized housing estates. Elsewhere the settlement comprises mainly frontage development with only minor cul-de-sacs. The result is that areas of countryside extend into the heart of the village, and this forms a key part of its character which would be affected by the scheme.
- 19. In terms of its landscape setting, the steep sided River Somer valley lies just to the north of the built-up core of the village with the countryside to the south, of which the appeal site forms part, rising steadily to the 220 m contour at Blacker's Hill. The main part of the village lies in the valley below the 190 m contour, and gently slopes down to the east. However, with the mile long linear development along Stockhill Road to one side, the appeal site rises above the main village to about 200 m, the height difference from the northwest corner to the southern boundary being a noticeable 9.7 m. As a result

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<sup>&</sup>lt;sup>3</sup> LPP2 paragraph 3.28 states: 'Further growth in these villages... does not reflect the adopted spatial strategy'

- there are views up towards the site from numerous properties in the village as well as public views from adjacent roads and some footpaths. The top of the site overlooks the village and the new housing would do likewise.
- 20. The relationship of the site to the village and the significantly rising ground are therefore key factors. Whilst the site is adjacent to the 'development limits' of the village to the west and north, to the west this comprises the linear mostly frontage development along Stockhill Road and to the north frontage development along Hoecroft with two small culs-de-sac Hoecroft Gardens and Westmead. Both comprise fingers of development extending into the open countryside with, to the north of Hoecroft, a visually important grass field designated as an Open Area of Local Significance by LPP1 Policy DP2 and hence protected from development. The proposal would not therefore comprise a logical extension of the village as claimed but would be seen as an unduly large, individual estate, detached from its main built-up core which starts at Naish's Cross and the northern end of Rock Road. It would be incongruously located, encroaching into the countryside which extends into the heart of the village, eroding its character. A scheme of up to 95 dwellings here would be out of scale in relation to the smaller estates in the main core of the village. Views from the Open Area of Local Significance into the countryside to the south, albeit private land and filtered through the trees along Hoecroft, would be lost to be replaced with views of a large housing estate on rising ground. This would erode the attractive semi-rural character of this part of the village.
- 21. Neither the appeal site or the surrounding area form part of a designated or protected landscape. The Landscape Assessment of Mendip District published in 1997 describes the landscape around Chilcompton as complex but places the area south of the B3139 in the Emborough-Picot Ridge landscape character sub-area. This area is characterised by rectilinear fields, infrequent hedgerow trees and some urban fringe influences including Stockhill Road, some scattered housing and the industrial estate on the site of the old colliery on Rock Road. The appeal site and its surroundings are representative of this landscape. The site comprises attractive grazing fields with well-maintained hedgerow boundaries, is in good condition, forms an important part of the rural setting of the village and is clearly visible from nearby roads and footpaths. Whilst there is no public access onto the site itself and there are urban influences including some adjacent housing and a minor power line, the site and surroundings should be seen as having medium value, not of national importance but much valued locally.
- 22. The landscape and visual impact of the proposal would be mitigated by retaining the majority of boundary hedgerows, providing linear green open spaces with new native tree, hedge and shrub planting along its external boundaries, an area of new woodland in the south-east corner of the site and street trees within the housing layout. Apart from the woodland, boundary planting would be limited to a strip of about 10 m which would not screen the buildings or strengthen landscape character but simply integrate the development into the extended village. This peripheral landscaping, which would take many years to become established, would therefore have only a limited effect in reducing the landscape and visual harm of the proposal.
- 23. The proposed change from open pasture to residential housing estate would fundamentally change the rural character of the site, altering its nature and function, which can only be seen as high magnitude change, notwithstanding

open space and landscaping as part of the layout. Currently part of the gradual transition from the main built-up core of the village to the unspoilt countryside without urban influences further south, the sensitivity of the site and surrounding landscape to the scheme should be seen as medium. Overall, even taking account of the screening effect of hedgerows and nearby housing, the appellant's LVIA underestimates the significance of the effect of the scheme on the landscape character of the site and its surroundings. This should be seen as substantial adverse, as assessed by the Council.

- 24. In addition, the character of the area would be adversely affected at night with numerous residential and street lights visible across a large housing estate on rising ground where at present there are none.
- 25. To assess the visual impact of the proposal, the LVIA identifies 16 viewpoints (VPs) around the site and wireframe visualisations were produced for five of these on completion of the scheme and at year 10. However, the VPs were not agreed with the Council and exclude any to assess the impact on occupiers of adjacent residential properties, despite these being accepted as high-sensitivity receptors. In addition, obvious VPs opposite the entrance to the site (Council photo C) and from Stockhill Road between Nos 17-19 (A) are missing and the position of VPs 3 and 9 obscure the views through the gateways concerned.
- 26. The housing on Stockhill Road and Hoecroft Gardens which backs onto the site to its west and north would screen most views of the proposal from users of these sections of road. For example, from Naish's Cross (VP1), any rooftops would be seen with existing housing in the foreground so the visual impact would be only minor adverse. Intervening housing would also screen views from some of the more distant viewpoints, eg VP14. However, where there are views through to the site, such as VP2 through the garden of Rock View or glimpses between Nos 19-31 Stockhill Road, an in-depth housing estate behind the frontage housing would be readily apparent changing the existing village edge character to a more built-up area.
- 27. The proposal would have its greatest visual impact from public viewpoints along Hoecroft where the site access would require the removal of all 65 m of hedge between Croft House and Rock View (C). Six residential properties directly face this hedge, with first floor windows overlooking the fields. These residents, high-sensitivity receptors, together with pedestrians and other road users, would see a change of high magnitude. Although some of the hedge would be reinstated behind the visibility splay and the site entrance would be landscaped, the current view of a rural hedge, or from first floor windows the grass fields, would be replaced by a wide and deep residential estate rising up in the view to the top of the site. The visual impact would be major adverse, reducing slightly over time as the landscaping takes effect.
- 28. Along Rock Road (VP3) the character of a rural lane with a well-maintained hedge and open field behind would change but the scheme includes substantial woodland planting in the south-east corner of the site adjacent to the road. Over time this would largely screen the new housing behind resulting in medium change; with few pedestrians along this section of road the receptors have less sensitivity leading to an assessment of minor to moderate adverse impact as the woodland becomes established.
- 29. Footpath 5/26 crosses the fields between Rock Road and Stockdale Road a short distance to the south of the appeal site and includes VPs 4 to 7. Walkers

on this route enjoying the countryside are high-sensitivity receptors. Whilst the definitive path lies to the south of a hedgeline this is not often reinstated across the arable field so users generally walk alongside the low hedge with views over it towards the site. Walking west the proposed woodland in the south-east corner of the site would reduce to a 10 m strip which would do little to screen the new houses. Although as one walks the views of the site become more distant and the housing along Stockdale Road more apparent, the introduction of a large housing estate would be a moderate magnitude change. However, by greatly consolidating the fragmented development in these views and bringing the village much closer, the proposal would have a moderate to substantial adverse impact when seen by footpath users.

- 30. The sensitivity of views from Stockhill Road near VP9 are also high, being seen both by walkers through the wide gap next to No 45 and the residents of about ten houses with first floor windows overlooking the site. These are the only residents noted as receptors by the LVIA. The new housing estate would be set back by just one field from the road with only limited screening provided by a low hedge, two or three hedgerow trees and the 10 m strip. With the major loss of rural outlook, the visual impact here would be substantial adverse.
- 31. Finally, on a tour around the site, there would be a substantial adverse impact on missing viewpoint A with its view up towards attractive grazing land. Whilst seen in a built-up context between Nos 17-19 Stockhill Road, the view brings walkers a valuable appreciation of the adjacent countryside, reinforcing the character of the village in its rural setting. The new estate would completely fill this view substituting a more intensively built-up character.
- 32. The LVIA thus significantly underestimates the visual impact of the proposal on many surrounding public viewpoints and the receptors involved. However, as pointed out by the Council, the most serious omission is the failure to assess the impact on nearby residential occupiers. Whilst recognising there is no right to a view, the appellant accepts that these are high-sensitivity receptors who would be adversely affected by the visual impact of the scheme at home every day. Their sensitivity as receptors is particularly high when views from ground floor windows or private rear gardens are involved as in many cases here.
- 33. The appeal site has a close visual inter-relationship with about 50 properties adjacent to the site. Six two-storey houses on Hoecroft directly face the frontage of the site across the road, about ten on Stockhill Road face it across a small field and about 10 properties on Wells Road have more distant views across the Open Area of Local Significance up towards the site, albeit filtered through the trees on Hoecroft. About 20 properties on Stockhill Road and Hoecroft Gardens back directly onto the site with views across it. Some have little or no screening, in particular Nos 17 & 19 Stockhill Road, 7 Hoecroft Gardens and Rock View. Most notable of all the two-storey Croft House backs onto the site with its rear elevation, unscreened, only a metre or so from the field boundary. The failure of the LVIA to even mention this house, the single most affected by the scheme, is particularly hard to explain.
- 34. As with landscape impact, the change from open pasture to built-up residential housing estate would fundamentally harm the rural character of the site resulting in an adverse visual impact for the residents concerned. The 10 m wide landscape strip would integrate the housing into the village rather than screen it. The magnitude of visual change as seen by these residents would be

high, in a few cases very high, with the impact only increased by the location of the new housing on rising ground, well above the level of rear gardens in some cases. As high sensitivity receptors the significance of the visual impact on these residents would therefore be major adverse in the case of Croft House, Rock View, the six houses on Hoecroft, 7 Hoecroft Gardens and Nos 17 & 19 Stockhill Road. The visual impact on receptors in other adjacent properties would be substantial adverse and those further afield moderate adverse. The submitted LVIA fails to include this assessment.

- 35. In conclusion, the proposal would significantly harm the character and appearance of the area, adversely affecting the form of the village and surrounding landscape. It would not comprise a logical extension to the village, being an unduly large, individual estate, detached from its main built-up core. It would be incongruously located, encroaching into the countryside which extends into the heart of the village, eroding its character. The LVIA underestimates the effect of the scheme on the landscape which would be substantial adverse. The visual impact from nearby public viewpoints is also underestimated, including from Hoecroft which would be major adverse, reducing only slowly over time as the landscaping takes effect. The LVIA also fails to assess the visual impact on residents living in about 50 properties around the site where the impact on high sensitivity receptors would be major adverse in some cases, most notably Croft House. Taking these considerations together, the overall adverse impact of the scheme would be substantial in conflict with LPP1 Policies DP1, DP4 and DP7.
- 36. Contrary to Policy DP1, the proposal would detract from the maintenance and enhancement of local identity and distinctiveness, fails to appreciate the built and natural context, and fails to recognise that distinctive townscapes, views, scenery and other features collectively generate a distinct sense of place and local identity even though these may not always be formally recognised. Contrary to Policy DP4 the scheme would degrade the quality of the local landscape and fails to demonstrate that its siting and design are compatible with the pattern of natural and man-made features of the relevant landscape character area. Finally, contrary to Policy DP7, the proposal would not be of a scale, form and layout that would be appropriate to the local context. Whilst these policies are out of date insofar as they restrict new housing, their policy principles do not conflict with the NPPF, remain valid and should be given significant weight.
- 37. The proposal would also conflict with one of the key aims of the Chilcompton Village Design Statement, adopted by the Parish Council in 2015. This notes on page 5 that the built form of the village and the existing development limits mean that views of the countryside around the village are often visible from within it. These countryside views include those from viewpoints A and C which would become views of a built-up area.

#### Services and facilities

38. Reflecting local concerns, the Council argue that with the appeal scheme and the resulting 35% growth in households over the 2006-29 period it is 'almost inevitable' that the existing services and facilities in the village will be put under significant strain. However, additional patronage from new residents can only be of benefit to the private sector businesses in the village which include shops, public houses and various services. In relation to community facilities,

- no evidence was presented for example of a quantified shortage of playing field provision or unmet demand for use of the village hall.
- 39. One of the GPs at the local surgery objects to the proposal as the service is already overstretched, and states that further patients in the village with no extra resources would be likely to lead to a watered down service. However, GP services are under pressure across the country and this is not a reason to prevent development. Chilcompton is one of six villages in the district with a GP facility<sup>4</sup>, a branch of the St Chad's practice in Midsomer Norton. This gives the opportunity for appointments in the village, reducing the need to travel. Even if some appointments need to be made at Midsomer Norton, for relatively irregular visits to the GP this is not unduly burdensome. There is no evidence that the practice is turning away new patients from its catchment area which would require registration at a surgery elsewhere and would potentially have sustainability implications.
- 40. However, there is one issue that raises significant implications for the need to travel, namely the capacity of the village primary school, the St Vigor and St John Church School. This primarily serves a specific united benefice area<sup>5</sup> and forms part of the Bath and Wells Multi Academy Trust. The single form entry school, currently rated outstanding, is popular and regularly oversubscribed so all its seven year groups are full. Whilst recent admissions data shows those from the benefice have not been turned away from reception<sup>6</sup>, 18 in-year admission requests<sup>7</sup> have been turned down in the last three years so these children, presumably from the village, have to go elsewhere, generating private car journeys and an unsatisfactory situation for the children and their parents.
- 41. There is no dispute that the 95 dwelling scheme would generate about 31 extra primary age children and the appellant has agreed to contribute £566k to the local education authority (LEA) to fund the necessary places. The Section 106 agreement states that this is for the expansion of the village school and a concept plan shows how an eighth classroom could be provided at the end of the main corridor. The LEA confirm that it is common for schools to have mixed year groups with 9 primary schools in Somerset operating an 8 class system. However, as an academy school not under the direct control of the LEA there has to be agreement with the Academy Trust and this is not in place. An email from the headteacher dated 9 December 2021<sup>8</sup> states one additional classroom would 'clearly not be acceptable' without further classrooms for a larger two form entry school. There are no plans for a larger school of this nature and insufficient space on the site.
- 42. This leaves the school expansion plans uncertain, a deeply unsatisfactory position for the inquiry where the sustainability credentials of Chilcompton are a critical issue. The school is already under pressure, without additional places the children generated by the scheme (or those they displace) would have to be accommodated elsewhere generating daily traffic movements primarily by private car. Every primary village has a school, the most important facility used to assess their suitability for additional development<sup>9</sup>. Whilst the LEA project slightly reducing pupil numbers over the period to 2025, this would not

<sup>&</sup>lt;sup>4</sup> Rural Settlement Role & Function Paper table B

<sup>&</sup>lt;sup>5</sup> The United Benefice of Chilcompton with Downside and Stratton on the Fosse

<sup>&</sup>lt;sup>6</sup> 2019 and 2021 data show a small number from outside the benefice gaining a place.

<sup>&</sup>lt;sup>7</sup> Requests for older children to join year groups following reception.

<sup>8</sup> via Mc Moon

<sup>&</sup>lt;sup>9</sup> Rural Settlement Role & Function Paper paragraph 4.3 and table B

- provide sufficient capacity and discounts the possibility of some parents from the LPP2 MN1 allocation for 250 dwellings on the edge of Midsomer Norton opting for the school rather than more local alternatives. Living within the benefice, they will have the same right to a place as those from Chilcompton<sup>10</sup>.
- 43. The S106 agreement is clear where the funding is to be spent but the Academy Trust is not a signatory to it. The appellant has perhaps understandably dealt with the LEA as the statutory consultee responsible for providing school places and maintains that great or considerable weight should be given to their position in accordance with Shadwell Estates Ltd¹¹. However, in the unusual circumstances of this case there are cogent and compelling reasons to doubt whether the LEA plan is deliverable. The LEA would of course provide the school places needed but not necessarily in Chilcompton. In the event of ongoing disagreement the LEA could seek to vary the S106 agreement and spend the funds to expand a school elsewhere. This may not happen, but the hostage to fortune is too great to set aside in this case.
- 44. In conclusion, there is no evidence that the services and facilities of the village are unable to accommodate the quantum of housing proposed with the notable and important exception that there are no definitive agreed plans for expansion of the primary school. Notwithstanding the provision of funding in the S106 agreement and the intentions of the LEA, in the absence of agreed plans the proposal would require a significant number of primary school children to be educated outside the village, generating daily journeys by private car. This would be contrary to paragraph 105 of the NPPF, would fatally undermine the primary village status of Chilcompton as a location for additional housing development, and would be a significant adverse impact of the scheme.

#### Other matter - access

- 45. The proposed access to the site, not a reserved matter, would be via a priority controlled junction from Hoecroft, the B3356, which would be widened along the site frontage. The junction would include sections of 2 m wide footway on both sides which would link with off-site highway improvements between the site and Naish's Cross. These would provide traffic calming with two give way points<sup>12</sup> to oncoming traffic and a continuous footway to the Co-op and the village beyond. The footway improvements would link the existing disjointed sections, albeit a substandard 1.2 m width in places and requiring pedestrians to cross the road three times as well as at Naish's Cross.
- 46. The local highway authority (LHA) raise no objection to these arrangements subject to conditions and a S106 agreement. The traffic impact analysis estimates the scheme would generate about 50 two-way vehicle movements in each peak hour, less than one per minute, which would not cause capacity issues at the site entrance or any nearby junction. A residential travel plan is also proposed to promote sustainable modes of transport.
- 47. Having reviewed local accident data, the appellant concludes there are no particular road safety issues in the vicinity. However, Hoecroft, the B3356, narrows between Croft House and Dulverton Cottage just to the east of the site entrance and bends sharply to the south, limiting forward visibility. A large

<sup>&</sup>lt;sup>10</sup> No distance criterion is used within the benefice area.

<sup>&</sup>lt;sup>11</sup> Shadwell Estates Ltd v Breckland DC WL 127846 (2013) paragraph 72

<sup>&</sup>lt;sup>12</sup> The appellant's witness advised that traffic waiting at the first give way point would not obscure the visibility of oncoming traffic from those turning right out of the scheme.

vehicle is unable to pass a car here and there is no footway, nor along Rock Road to the north. There is strong local concern about the effect of the scheme on highway safety here although these concerns are apparently not shared by the LHA.

- 48. Since northbound traffic on the B3356 splits about 50:50 between Hoecroft and Rock Road and about 40% of scheme traffic would use the B3139 (east) out of the village<sup>13</sup>, it is hard to explain the LHA decision not to model any scheme traffic using Rock Road (north). Whilst the flows involved would not result in any capacity constraints, this would increase the scope for pedestrian/vehicle conflict in the narrow lane between Croft House and Dulverton Cottage.
- 49. This is important because 95 dwellings would generate a significant number of pedestrian movements every day and many of these, perhaps half, would be heading towards the key village facilities of the school, village hall and doctors surgery. The most direct route to these is along Rock Road and the inquiry heard that existing residents of Westmead walk this way. Whilst the footway to Naish's Cross would be improved and some may use this roundabout route, the scheme would undoubtedly generate extra pedestrian movements between Croft House and Dulverton Cottage and then along Rock Road (north) where there are no footways. The significantly increased number of pedestrians walking this route would lead to highway safety dangers that would offset the benefit of the footway improvements to Naish's Cross.

## Planning Balance14

#### Development Plan

- 50. The proposal lies outside the development limits of Chilcompton and conflicts with the spatial strategy of the plan as set out in LPP1 Policies CP1, CP2 and CP4. The proposal would also significantly harm the character and appearance of the area, adversely affecting the form of the village and surrounding landscape contrary to LPP1 Policies DP1, DP4 and DP7. These six policies are the most important for determining the application but due to the significant housing land supply shortfall are out of date. Some further housing outside development limits will inevitably be required to supplement that supply.
- 51. It follows that the tilted balance in the NPPF is engaged in this case and there is a presumption in favour of granting permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.
- 52. Whilst recognising this presumption, the basic principles of these six policies do not conflict with the NPPF, remain valid and should be given significant weight. The view that they should only be given limited weight underplays their continuing importance.

#### Benefits

53. The principal benefit of the proposal is the provision of up to 95 dwellings. This is a significant benefit which would contribute towards local housing needs and the NPPF objective to significantly boost the supply of homes. It would be particularly beneficial in this case as the Council can only demonstrate 3.5

<sup>13</sup> Eddisons Transport Assessment Figures 1 and 5

<sup>&</sup>lt;sup>14</sup> The relative but not quantifiable terms substantial, significant, limited and minor are used.

years supply of deliverable housing land, well short of five years which is itself a minimum requirement. This figure has reduced from 3.8 years supply in December 2020 and there is no prospect of further allocations coming forward through the local plan review for a lengthy period. Completions in 2020/21 have already fallen short and the trajectory for housing delivery over the next five years appears ambitious. The appellant has a strong track record with developers having already expressed interest in the site so there is little doubt the scheme would be delivered within the five-year period.

- 54. Housing delivery in a large part of the district, including four of the five main towns and many primary villages, is currently restricted until the effects on water quality in the Somerset Levels RAMSAR site can be adequately mitigated. The appellant argues that additional housing in unaffected areas such as Chilcompton will therefore be even more necessary, on the other hand the Council claim the situation is temporary and being resolved. In any event, delivery from several sites has been excluded from the five-year housing land supply calculation due to the need for phosphate mitigation so this factor has already been taken into account.
- 55. The proposal would deliver up to 29 affordable dwellings, 30% of the total, which complies with LPP1 Policy DP11. This would be a significant benefit. 65% would be for social rent and the remainder shared ownership. There is no dispute that affordable housing is much needed in the district, with high house prices and low affordability, and this is even more the case in Chilcompton. There were 1,636 households on the district waiting list in April 2021 with a need for 240 affordable homes per annum but a predicted supply of only 140 with the average delivery of affordable housing running at 20% of the total. In Chilcompton, 50 affordable dwellings have been delivered since 2006 but with no further supply planned the current waiting list of 34 households represents a real need that the scheme would help meet.
- 56. The proposal would deliver economic benefits with an estimated construction spend of £10.4m, gross value added of £4m, 88 construction and 96 indirect jobs during the build period. On completion about 112 economically active residents in the scheme would spend over £2.9m annually and generate £1.6m in Council Tax over 10 years. This would be a limited benefit as the expenditure would be spread over a wide area, not just the district.
- 57. The scheme would include green infrastructure and public open space including play space and informal walking routes to meet the needs of the development. These areas would also be accessible to existing village residents, although as a cul-de-sac with no planned connection to Stockhill Road and a relatively long footway access from Naish's Cross they may not be well used by the village as a whole. This would consequently constitute a minor benefit.
- 58. The proposal would provide improvements in biodiversity with new habitat creation and an overall net gain in horseshoe bat habitat. This would include hedgerow creation, new trees and shrubs, wildflower grassland and specific enhancements for hedgehogs, amphibians, reptiles, birds and invertebrates. However, biodiversity improvements could be implemented on the land without housing and bats could be adversely affected prior to the habitat becoming fully effective. Overall this would be a minor benefit of the scheme.
- 59. Finally, the scheme would provide an improved pedestrian footway towards Naish's Cross which would benefit the existing residents of Westmead, Hoecroft

and Hoecroft Gardens. However, as explained above, this would be offset by the disadvantage of generating additional pedestrian movements along the narrow section of lane between Croft House and Dulverton Cottage and along Rock Road (north) where there are no footways. This factor is therefore neutral in the planning balance.

#### Adverse impacts

- 60. Were the scheme to go ahead, Chilcompton would be at the leading edge of village growth during the plan period. There are no examples of single schemes of the size of 95 dwellings elsewhere and the scheme would not be 'small' in line with LPP2 paragraph 3.28. The scheme would therefore skew the spatial strategy of the development plan away from the main towns and deliver a less sustainable pattern of growth for Mendip district than the LPP1 intends. However, unless repeated in other villages, it would not seriously undermine the strategy overall and would amount to limited harm.
- 61. The proposal would significantly harm the character and appearance of the area, adversely affecting the form of the village and surrounding landscape. It would not comprise a logical extension to the village, being an unduly large, individual estate, detached from its main built-up core. It would be incongruously located, encroaching into the countryside which extends into the heart of the village, eroding its character. The LVIA underestimates the effect of the scheme on the landscape which would be substantial adverse. The visual impact from nearby public viewpoints is also underestimated, including from Hoecroft which would be major adverse, reducing only slowly over time as the landscaping takes effect. The LVIA also fails to assess the visual impact on residents living in about 50 properties around the site where the impact on high sensitivity receptors would be major adverse in some cases, most notably Croft House. Overall, the adverse impact would be substantial.
- 62. There are no definitive agreed plans for expansion of the primary school. Notwithstanding the provision of funding in the S106 agreement and the intentions of the LEA, in the absence of agreed plans the proposal would require a significant number of primary school children to be educated outside the village, generating daily journeys by private car. This would be contrary to paragraph 105 of the NPPF, would fatally undermine the primary village status of Chilcompton as a location for additional housing development, and would be a significant adverse impact of the scheme.

#### Balance

- 63. The proposal would deliver up to 95 dwellings within five years of which 30% would be affordable. Given the current shortfall and need for these, significant weight should be afforded to both these benefits and limited weight to the associated economic benefits. In addition, the provision of green infrastructure/public open space and biodiversity improvements as part of the scheme would be minor benefits.
- 64. On the other hand, the proposal would comprise limited harm to the spatial strategy of the development plan and, the clearly overriding and decisive factor in this case, substantial harm to the character and appearance of the area, including the form of the village and resulting landscape and visual harm. These adverse impacts significantly and demonstrably outweigh the benefits of the scheme when assessed against the policies in the NPPF taken as a whole.

65. In addition, in the absence of agreed school expansion plans, the proposal would generate significant additional daily journeys by car, fatally undermining Chilcompton's status as a primary village suitable for additional development and a significant adverse impact of the scheme. However, for the avoidance of doubt, even if school expansion plans are agreed, the other adverse impacts are such that the conclusion in the previous paragraph would still apply.

#### Precedent

66. The appellant draws attention to a recently allowed appeal at Coleford<sup>15</sup>, a scheme for up to 63 dwellings on a single field adjacent to the development limits of another primary village where similar policy considerations applied. However, every village and site is different and the inspector in that case concludes that the scheme would not appear as an incongruous 'bolt on' and the level of impact to the landscape would be limited. By contrast, in this case the proposed housing estate would appear as an incongruous addition to the village and the level of landscape and visual impact would be substantial.

#### Conclusion

- 67. Having regard to the above, the material considerations in this case, including the presumption in favour of sustainable development, do not indicate a decision should be made at variance with the development plan.
- 68. The appeal should therefore be dismissed.

David Reed

**INSPECTOR** 

<sup>15</sup> APP/Q3305/W/20/3265459

#### **APPEARANCES**

FOR THE APPELLANT:

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INTERESTED PARTIES:

Richard Morgan Deputy Chairman of Chilcompton Parish

Council

Sam Phripp Mendip District Councillor for local ward

Richard Moon Chairman, Chilmorton Against Rural Over-

Development Public Inquiry Committee

Debbie Caple Local resident

Geoffrey Kingman representing Amber Goodey Local resident

Lewis Anderson Local resident

Vyvyan Pugh Local resident

Jane Undery representing A J Champions & Sons Ltd Local business

Viv Moon Local resident and Primary School Governor

Simon Smedley Local resident

Paul Undery Local resident

## DOCUMENTS SUBMITTED AT THE INQUIRY

Opening and Closing Statements from the Appellant and Council

Plan of Chilcompton showing new dwellings built or committed since 2006

Draft Conditions - revised list submitted on 10 December

Completed S106 agreement and CIL Compliance Statement

CIL Statement from Somerset County Council as Local Education Authority

Chilcompton Against Rural Over-Development – petition with 148 signatories and list of speakers

Statements from Amber Goodey, Debbie Caple, Richard Moon, Sam Phripp, Richard Morgan, Vyvyan Pugh, Lewis Anderson, Steve Champion

Ecology Speaking Notes of Dr Simpson

Habitats Regulations Assessment

Regulation 9 (Habitats Regulations 2017) Report

Letter from Natural England dated 6 December 2021

Various emails dated 7-10 December from SCC Estates Planning Advisor together with concept plans for a single classroom extension at Primary School

Email from Headteacher of Primary School dated 9 December 2021 via Ms Moon

Mendip District Council LPP2 Main Modifications for consultation January 2020

Wider topography map of Chilcompton area

Map of Landscape Character Areas from Mendip Landscape Assessment 1997

First Admissions Allocation Summary for Primary School 2019 & 2021

Shadwell Estates Ltd v Breckland District Council WL 127846 (2013)

Spot height data from Aspect Landscape Planning and Jane Undery

# Appendix A18. Chilcompton appeal – context map





Naish's Cross Chilcompton PINS APP/ Charles Potterton – Landscape Appendices

## Appendix A19. ALC Maps

# **South West Region**

## 1:250 000\* Series Agricultural Land Classification

This map represents a generalised pattern of land classification grades and any enlargement of the scale of the map would be misleading. This map does not show subdivisions of Grade 3 which are normally mapped by more detailed survey work.

1:300 000 at A0

#### Further information

Details of the system of grading can be found in: Agricultural Land Classification of England and Wales revised guidelines and criteria for grading the quality of agricultural land. <a href="www.defra.gov.uk">www.defra.gov.uk</a>

For further information about the availability of Agricultural Land Classification data, including more detaile local surveys, please contact the Natural England Enquiry Service on 0845 600 3078 or e-mail enquiries@naturalengland.org.uk

# Grade Description 1 Excellent 2 Very Good 3 Good to Moderate 4 Poor 5 Very Poor

#### Non-Agricultural Land

- Other land primarily in non-agricultural use
- Land predominantly in urban use

