Comment for planning application P/OUT/2023/01166

Application Number P/OUT/2023/01166

Location

Land To The South Of Ringwood Road Alderholt

Proposal

Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000sgm of employment space in the form of a business park; village centre with associated retail, commercial, community and health faculties; 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)

Case Officer

Ursula Fay

Organisation

Name

Alderholt Parish Council

Address

Parish Office, 1 Station Road, Alderholt, SP6 3RB,

Type of Comment

Objection

Type

neighbour

Comments

The Parish Council strongly objects to this application as it is outside the village envelope and as such is contrary to the existing East Dorset Core Strategy and Local Plan Policies. See attached - 2 documents

Received Date

04/05/2023 12:29:21

Attachments

The following files have been uploaded:

- APC Final comments application 2023-01166 24.4.2023.pdf
- File Note Housing Target ALNP 230309.pdf

APPLICATION No: P/OUT/2023/01166

Address; Land to The South of Ringwood Road, Alderholt

Councillor Name; Gina Logan

Brief summary of application location, type, proposal

Mixed use development of up to 1,700 dwellings including affordable housing and care provision; 10,000sqm 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 greenspace (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)

Date of site visit (if considered necessary) and any comments - Not necessary

Comments on website (DC website should be checked for updates from Statutory consultees and public comments up to the date of the planning meeting)

Numerous comments on the website. The Parish office has also received comments and many wide-ranging comments were garnered at a public meeting held on 11th April 2023.

Discuss with Case Officer (if considered necessary) Not necessary

Relevant Planning Policies (Refer to The Local Plan www.dorsetforyou.com/planning)

Local Plan Policy A1, DES11, Core Strategy Objective 6, Core Strategy Policies HE2, KS2, ME1, ME2, ME7 and the following NPPF clauses 8, 9, 11, 85, 111.

Any other considerations

East Dorset Core Strategy and Local Plan Policies

- The site is outside the village envelope and Policy A1 is still the primary policy to be referred to regarding
 Alderholt, so any development on this large site would be contrary to this, and we refute the statement at 5.5 in
 the Planning Statement.
- The siting of up to 1700 dwellings on the very edge of the village would be out of keeping as it represents a more than doubling of the existing village. At the 2011 Census 2.28 people resided in each dwelling thus 1700 x 2.28 = 3,876 additional residents (more than 120% population increase), resulting in a separate entity "Aderholt Meadows" abutting the existing settlement. The size of this potential development far exceeds any "allowed scale" envisaged under policy KS2.
- The existing residential properties along Hillbury Road and Ringwood Road are generally well spaced as the street scene flows from the village to the rural environment, and this development with densities of 32 and 33dph would result in harm to the open character of the countryside and is therefore contrary to Policy HE2 of the Core Strategy and policy DES11 of the Local Plan.
- No excuse for greenfield development as LA is in the process of producing a Dorset wide Local Plan which at
 the first consultation had no allocated sites for development in Alderholt. There's an adequate housing land
 supply elsewhere in the county so there is no requirement for such a development in the countryside outside
 defined village envelopes.
- The East Dorset Five-year Housing Land Supply April 2021 document produced by Dorset Council has detailed enough housing stock without increasing development outside the village envelope in Alderholt. For the period 2021 to 2026 the East Dorset area can demonstrate a supply of deliverable sites equivalent to 5.20 years. The

2021 Housing Delivery Test shows 94% for the East Dorset area. These currently meet the requirements of NPPF11 d) and it could be argued that the adverse impacts of such a development would definitely outweigh any benefits.

Christchurch & East Dorset Local Plan – Part 1 Core Strategy adopted April 2014

- The application is contrary to Objective 6 which states that:
 Development will be located in the most accessible locations, focused on prime transport corridors and town centres. New development will be located either close to existing facilities, or where good transport links exist to such facilities.
- Although Alderholt may be relatively close to Fordingbridge, Hampshire (2.5 miles) good transport links don't
 exist. Public transport is limited to one regulated service, the 97 bus which has a very limited service, and
 some bookable PlusBus services. There's a lack of safe walking and cycle routes to Fordingbridge.

Planning Statement (PS)

The following observations are made: -

- 2.10 & 5.7 Alderholt was considered for development in the East Dorset Local Plan review of 2019, the Parish Council strongly rejected the proposal, and following the 2 options suggested in the Dorset Council Draft Local Plan consultation in 2021 a full range of comments & objections were put forward. The PS at 5.7 has failed to examine and consider these.
- 4.48 and 5.59 5.69 Mineral extraction of sand and gravel to be used for construction on site. No mention or reference is made of the 2019 updated Dorset Minerals & Waste Plan, where this site is not allocated. What are the implications on both hydrology most importantly, and topography of the area not only during extraction but also when filling the voids? This is likely to be contrary to policy ME7 of the Core Strategy. Planning permission must be secured before any granting of this outline permission, the hybrid situation at Crossways should not be deemed a precedent for this development site. There was no prior extraction of minerals at the Wimborne development sites.
- 5.10 5.13 Refer to housing and affordable housing and your attention is drawn to the appended Alderholt Neighbourhood Plan Housing Target Paper 9 March 2023.
- 5.46 There is a total lack of detail regarding foul water strategy.
- 5.70 The requirement for Service Charges renders this development more leasehold than freehold, and is contrary to Government thinking. Clarification is also sought regarding the ownership of the open spaces ie SANGS etc.

Sustainability

The proposed development does not meet the roles of NPPF8 and is unsustainable as the infrastructure of the village is poor, and such a large development on the edge of Alderholt, would not be able to support the range of facilities mentioned at para 4.2 of the Transport Assessment (TA) and page 53 of the Design & Access Statement (DAS).

For example, we would only get a doctor's surgery when the population exceeds 20,000. Large scale expansion would add intolerable pressure on both the Fordingbridge and Cranborne surgeries. Both have difficulty in getting Doctors and Fordingbridge, in particular, is concerned whether they can meet the planned growth in Fordingbridge without adding extra pressure with development in Alderholt.

It should be noted that the provision of an additional pub, café, and supermarket would be in direct competition with the existing Alderholt facilities thereby jeopardising the continuance and success of these.

The high densities proposed 6.1 & 6.2 of the DAS i.e., 30 to 33 dph are generally much higher than that for Alderholt and that coupled with a lack of public transport will lock in much more travel by car making the development far from sustainable.

With reference to the Design & Access Statement (DAS) and Transport Assessment (TA) the following comments are made: -

Education The DAS on page 50 assumes that there will be adequate provision at Burgate School in Fordingbridge (the nearest) for secondary age children. At present children from Alderholt are bused not only to Burgate but also Wimborne and Cranborne. With high levels of development occurring at Wimborne and in Hampshire at both Fordingbridge and Ringwood, it is highly likely that these Hampshire schools will preclude Alderholt pupils, whilst the Wimborne school is also anticipated to be oversubscribed due to continuing development in Verwood. No provision is made in the application regarding this situation.

Employment Although land is set aside for employment 1.6Ha (only 1Ha building provision) page 57 of the DAS, there is no certainty that businesses will be attracted to the area as it is rural in nature, with a very poor local road network of B, C and D class rural lanes, no easy access to the A338 and A31 and no railway links. This will therefore necessitate more daily traffic flow out of the village and then back again.

It is unlikely that the development will lead to increased employment in Alderholt; increased development does not necessarily lead to increased infrastructure; 35 years ago, Alderholt had a wide range of facilities including large surplus store, public house, post office, petrol station, 2 part time doctors' surgeries, a vet, restaurant, 4 independent village shops plus hairdresser shop, butcher shop, estate agent shop, volunteer car service and much more. Housing has increased in Alderholt but these facilities have reduced, we now only have the local pub, a Co-op store with post office facilities, a small second-hand baby shop, garage, vet and garden centre.

Para 3.57 of the TA states "Therefore, at present the majority of everyday needs are met by car travel to neighbouring settlements". These needs are in fact employment, education, medical etc, with the car being essential.

The TA and DAS suggest that a regulated bus service is achievable, but at para 4.38 of the DAS they confirm that additional funding will be required to sustain the service – where is such money likely to come from? This service may be suitable for bussing children into school, but for employment purposes further afield, Bournemouth, Southampton, Basingstoke etc the only practical method of travel is by car. This is borne out by the 2021 Nomis statistics, where Alderholt (60%) has significantly higher use than Dorset (55%), the South West (48%) and England (44%). The 2011 Census shows Alderholt with 1.3 workers per household of which 80.4% commute, with 60% of them travelling over 20Km to work.

Para 6.11 of the TP confirms that "of the external journeys, the majority will be undertaken by car" and then goes on to assume "in practice the number of bus users is likely to increase at the expense of car driver trips." These two statements appear to be incompatible and juxtaposed.

The 2011 Census data shows that for Alderholt nearly two in three households (63%) had 2 or more cars (compared to the Dorset average of 41% and twice the England average of 32%). Very few Alderholt residents less than 6% did not have a car or van. If these percentages are carried across to the proposed development of 1700 residences, then the number of additional vehicles will be well in excess of 2,652, all of which will be using the road network, which is already under pressure.

Traffic Assessment (TA), Travel Plan (TP) and Planning Statement (PS) documents

The increased traffic movements raised by such a development are incompatible with NPPF85 as this development is certainly not sensitive to its surroundings and will have an adverse unacceptable impact on local roads.

With reference to NPPF111, this development should be refused on grounds of highway safety and as the residual cumulative impacts on the road network would be severe. This is borne out by the following: -

- 1700 residences assuming 1.3 workers per dwelling of which 80.4% commute to work will result in 1,777
 journeys generated at peak am and pm times in relation to employment. This additional volume of traffic when
 added to other domestic travel (shopping, taking children to school, attending appointments) and the everincreasing home delivery traffic, cannot be accommodated on the existing local rural road network.
- The documentation supplied makes no mention of any road improvements to the network, which to the north east, via B3078 to Fordingbridge, to the north via Sandleheath Road and the south via Harbridge Drove are all under the control of Hampshire County Council.

The following information has been obtained from Dorset Council Highways: Correspondence from Dorset Council Highways Section: Noted that funding will be limited, hence that no provision for major Road links is currently under consideration with any provisional finance for the future.
 Information issued (Ref: Dorset Highways Transport Policy Manager). Hampshire Council likewise have no plans for any future improvement scheme to the B3078.

Route 1. B3078 north east to Fordingbridge

Route 2. B3078 and Batterley Drove to Verwood.

Route 3. Harbridge Drove to Ringwood.

Route 4. Sandleheath Road north wards to access Salisbury via Rockbourne.

Route 5. B3078 west to Cranborne and beyond – Wimborne, Blandford and Shaftesbury

Route 1. B3078: This road is of a rural nature, narrow with many places reduced to single width only. Two difficult 90-degree bends exist within Alderholt, along with dangerous narrows throughout the route towards Fordingbridge. There are numerous extreme restrictions due to the historic Town's listed buildings. Paras 3.11 & 3.12 of the TA point this out. Para 5.18 of the PS suggests a priority working arrangement on this route, but again this is under the remit of Hampshire County Council. No mention is made of the capacity of Fordingbridge bridge with regard to it being able to cope with not only the increased volume of traffic but also the weight. Fordingbridge is already under stress due to the development currently being undertaken in the town.

Route 5. The B3078 route to Cranborne likewise has many narrow road widths, acute bends, single vehicle passage type streets with much negotiating around numerous parked vehicles at any time of the day or night (Castle Street). The TA and TP documents at 3.13 & 3.14 make no mention of these movement restrictions along Castle Street in Cranborne. The TA at 10.21 infers that although there are problems, the road is capable of taking an increased traffic flow, and suggests as mitigation that the route via Batterley Drove and Verwood is taken in order to access Wimborne – resulting in much longer distances and travel time, increasing pollution and carbon emissions.

Route 2. B3078 and Batterley Drove which commences at Cripplestyle is a rural road with two 90-degree bends, plus many narrow single width areas and the old bridge over the disused railway line. This description is missing from the TA and TP documents. At 10.23 of the TA the dangerous double S bends are mentioned – but driver error is evidenced as the reason for collisions, not the unsafe nature of the road.

Route 3. Harbridge Drove towards Ringwood is a C road, and is used by gravel and landfill HGVs servicing Hamer Warren Quarry. Two such vehicles (32tons) cannot pass on this route in many places resulting in destruction of the verges – see photos below.





This is totally at odds with the information supplied in the TA 10.6 to 10.11 as the OS mapping used is unreliable in replicating the actual road conditions. Although future works to overcome this are intimated by way of road widening para 5.18 of the Planning Statement and 10.9 of the TA – it is not acceptable to have this as a planning condition. There is no commitment regarding improvements and these are within the benefit of Hampshire County Council, and probably require land purchase in many locations.

Villagers use Kent Lane to access the A338 from Harbridge Drove but this is an extremely rural route that has side lane junctions with poor visibility and narrow single-track sections. The TA and TP documents make no mention of this route.

Route 4. This northbound route is totally omitted from the TA and TP documentation. The lane has two restrictive bridges. The old railway bridge has a height restriction and the Alderholt Mill Bridge both single width and weight restrictions. The onwards route from Sandleheath to Salisbury (A354) has many narrows and blind bends throughout making it unsuitable for increased traffic volumes, particularly in the village of Rockbourne.

It is the pinch points throughout the local road network that impede traffic movement, not the proposed new junctions to access the development site.

B3078 Traffic Flow Data: (Fordingbridge Road, Alderholt) Issued by Dorset Council for 2020/21. Note: Current Dorset Council advice that these flow levels are down by 28% due to Covid-19 effect.

Daily 2020 Vehicle flow volumes. Average 4047 (28% Adjusted 5180)

Annual 2020 Vehicle flows volumes. Average 1,477,155 (28% adjusted 1,890,700)

The trip distribution data para 6.16 onwards of the TA, has been based on the 2011 Census data, but this needs to be re-visited in the light of the most recent 2021 Census data, to give a more relevant overview of the impact such a development will have on the existing village of Alderholt and its surrounding communities.

The statement in the East Dorset Local Plan Adopted January 2002 for Alderholt states:

The immediate area is poorly served by roads. There are no class A roads anywhere near the village. The village currently relies on the recently designated B3078 to connect with Cranborne to the west and Fordingbridge to the north east. C class roads which also serve a number of gravel workings, provide connections to Ringwood to the south.

The vehicular access point on Hillbury Road is put forward as a roundabout on pages 59 and 61 of the DAS. The first paragraph states "...a new roundabout, which has been designed to accommodate the proposed level and type of traffic anticipated, whilst also ensuring that the design is sympathetic to its surroundings and is not overly engineered". Needless to say, this doesn't take account of the proposed site access for the potential Midgham Farm mineral extraction site that has recently been consulted upon re the HMWP Partial Update Regulation 18 Draft Plan. The existing farm entrance, the fourth arm of the roundabout is the access to the minerals site, requiring sufficient room for large HGVs in excess of 32 tons to manoeuvre both into and out of the site. Such a large construction will not be sympathetic to its rural surroundings. This will undoubtedly have an adverse impact on the proposed development site and its proposed access. It should also be noted that to achieve both the roundabout and sight lines, a number of Oak trees along Hillbury Road will have to be removed.

TA para 9.8 to 9.10, it is noted that no mention of Sandleheath Road has been included at the staggered cross roads (Pressey's Corner). Nor does it seem apparent that the impact of the through closure of Ringwood Road has been included in the assessments. There is some mention of queuing at Hillbury Road (9.10), but this is deemed to be acceptable. With the closure of Ringwood Road as a through route, all the traffic from the west wishing to access Ringwood will not travel down the whole length of Station Road and then turn right into Hillbury Road at Pressey's Corner which by its very nature is a dangerous junction, which will lead to queuing in Station Road. The junction is part of two 90 degree bends, has footpath E34/6 and the Chapel at the bottom of Hillbury Road, added to which there are no pavements. Traffic will also be wanting to exit from Sandleheath Road which compounds the inadequacy of the junction to cope with any significant increases in traffic. Local knowledge confirms that Sandleheath Road is used as a route from Verwood to Salisbury – a "rat run" avoiding the main roads – A31 and A338 this also compounds the problem of increased traffic volumes.

Thus, the traffic wanting to go to Ringwood will inevitably take the shortest route (via the Spine Road) all the way through the proposed new development – not a satisfactory solution bearing in mind the number of residents, the adverse impact of air pollution and the volume, size and nature of the through traffic eg CoOp delivery lorries.

At TA 11.13 mention is made of this document addressing the transport issues to meet the draft policy ALD1 of the draft Dorset Council Local Plan in providing a large strategic development in Alderholt. However, on referring to Vol 2 Chapter 18 of the DC Local Plan document, Option 1 was for about 300 new homes and the policy is headed –

ALD1: Small scale expansion on land north of Ringwood Road.

- 1. Land north of Ringwood Road is suggested as an option for the limited growth of Alderholt
- 2. The development should:
 - Take the form of two linked neighbourhoods, both served by the main vehicular access off Hillbury Road
 - Include an expansion and improvement of the existing recreation ground and a network of linked footpaths and cycleways
 - Be designed so that new homes front onto the recreation ground (and any extension) and front onto Hillbury Road; and
 - Include 0.25hectares of employment land and community facilities to be served off the main access road.

This potential large-scale development more than doubling the size of Alderholt bears no relationship to draft policy ALD1.

Finally, reference is made to Migham Lane this rural lane should be referred to a Lomer Lane.

Pedestrian Movement Much is made of the Bridleway E34/10 from Blackwater Grove to Verwood via Cranborne Common (paras 3.22 TP & 4.33 TA), and the footpaths 090 2/1 and 090 3/1 which link Hillbury Road to Lomer Lane (paras 3.23 to 3.26 TP & 4.31 to 4.33 TA).

Firstly, the requirements of SANGS for any development in Alderholt, required by Natural England, is to mitigate against unnecessary access onto a number of sensitive biodiversity sites which have national and international statutory designation.

Cranborne Common SPA, SAC, Ramsar and SSSI is designated for containing heathland and acidic grassland and the TP and TA documents promote the accessing of these sites via the bridleway E34/10 and forest tracks. Such activity will also extend to the Verwood Heaths SSSI (SPA and SAC). This increased activity will be detrimental to the wildlife, ecosystems and biodiversity within Cranborne Common.

With reference to the footpaths, the photos particularly Nos 7 & 8 of the TP were taken during the long hot summer and don't reflect the wetter periods, as shown by the comparable pictures below: -





TP 3.27, TA 4.16 and figure 10, indicate a number of pedestrian access points. It should be noted that these are onto privately owned land with public access.

Other Issues

Flooding Whilst responding to the HMWP Partial Update Regulation 18 Draft Plan consultation in January 2023, flooding and surface water was of great concern as shown by the photos of Harbridge Drove, and Drove End junction (Ringwood Road/Hillbury Road & Harbridge Drove).





Flooding at Harbridge Drove and Drove End Junction



This flooded field to the west of Hillbury Road is part of the proposed development site.

In light of this, has a strong enough assessment been made by the developer, to ensure flooding is not exacerbated, but actually reduced?

The Environmental Statement – Technical Appendix 11.1 4.6.2 & 4.6.3 state that "the site is above a Secondary A aquifer, that the ground water vulnerability for the site is medium to high, and that as the ground water levels beneath the site are unknown, further winter groundwater monitoring is required". However, the suggestion that this is left to the reserved matters stage or discharge of conditions is totally unacceptable as the monitoring needs to extend over a 1 year period, due to the uncertainty of our weather patterns at present, changes to intensity, duration and times of heavy rainfall and storm events. The table below shows the variability of rainfall.

Rainfall data (mm)

	2018	2019	2020	2021	2022	2023
J	76.4	40.7	109.0	94.4	31.6	114.2
F	42.4	55.5	130.6	75.6	70.0	12.2
M	148.3	80.0	54.6	37.0	54.0	122.6
A	75.4	54.0	51.8	12.8	26.8	
M	39.6	37.0	0.2	106.4	57.0	
J	0.4	74.4	59.6	83.8	48.2	
J	27.2	34.4	29.8	104.8	0.0	
A	64.0	43.4	103.4	21.2	15.4	
S	42.8	125.0	36.0	41.8	67.8	
О	44.8	135.6	170.8	141.6	82.6	
N	124.0	113.8	65.2	5.6	204.4	
D	139.4	144.4	140.4	84.0	110.6	
Total	824.7	938.2	950.8	809.0	768.0	

¹ https://www.metoffice.gov.uk/pub/data/weather/uk/climate/stationdata/hurndata.txt

It should also be noted that the development site in application 3/16/1446/OUT will also drain towards this site. Has the attenuation pond/basin 2 been adequately sized to meet this potential flood risk to third party land downstream?

Ecology Page 27 of DAS states that "the site is within a diverse and ecologically important landscape" and goes on to list all the nature conservation designations in close proximity. Such a large development i.e., 120% greater than the existing village will undoubtedly have an adverse impact on the environment particularly during the construction phases.

The East SANG on the Indicative Masterplan is unacceptable, doesn't comply with SANG Guidelines in that 2 major roads go through it, it is next to the proposed industrial site, and opposite a potential minerals' extraction and infill site.

The Indicative Masterplan and Masterplan Overview both show the potential 6.4 hectares of solar array mentioned at 3.10 (PS) this together with the existing solar farm at Blackwater Drove, constitutes a block of development which will not only have an adverse landscape impact but will to a great extent act as a barrier dividing the proposed West SANG from Cranborne Common resulting in a detrimental impact on the connectivity of biodiversity between the two locations.

Any new planting must exclude invasive species and any that could compromise existing local biodiversity, particularly Cranborne Common, and those that are known to be prone to disease.

Climate Change In this rural location with no public transport or easy connectivity resulting in a heavy reliance on the car for transport is at odds with the increasing need to meet the local and national climate change targets. Dorset having declared its own Climate Emergency and created its vision.

The calculations below show the environmental impact of commuting from this site and the requirement of 2,511.38 acres of new woodland required to offset this per year.

			ry Developmen	3	,	
As	sumptions and conv	versions		Source		
	1 mile	=	1.61km	Internet Converter		
	1 Ton	=	907.18kg	Internet Converter		
	1 Gallon	=	4.55 l	Internet Converter		
	1,700	dwe	ellings	From Dudsbury outline Plan		
	2	working adu	lts per dwelling	Assumption		
	261			365 days minus weekends and 4 weeks holiday		
	23.8	Alderholt to	Salisbury (km)	Google Maps		
	33		ournemouth (km)	Google Maps		
	19.11	Average fuel con	sumption (km per I)	Personal Use	Based on 6	
	113	Average CO2 emissions (g per km)		www.cars-data.com	reg VW Go TSI	
	2.5	CO2 offset in Tons per acre of new woodland		RICS		
Com	muting figures Per I	Household				
	1 days commutes	114	Km			
		5.94	Litres of fuel			
		12,836.80	grams of CO2	(12.84 kg)		
	1 years commutes	29,650	Km			
	_	1,551.31	Litres of fuel			
		3,350,404.80	grams of CO2	(3,350.40 kg)		

mmuting figures	for the wh	ole development			
1 days	commutes	193,120	Km		
		10,104.32	Litres of fuel		
		21,822,560.00	grams of CO2	(21,822.56 kg)	
1 years	commutes	50,404,320.00	Km		
		17,177,335.64	Litres of fuel		
		5,695,688,160.00	grams of CO2	(5,695,688.16 kg)	
			_	(6,278.45 tons)	
	2,51	1.38 acres of new w	oodland required to	o offset this	

Drainage Page 31 of the DAS gives a SUDS overview and mentions Wessex Water. As Alderholt lies within the catchment of the River Avon Special Area of Conservation (Salisbury to Christchurch) any development would have an adverse impact due to the potential eutrophication of the river by increased phosphate levels as a result of development. The Sustainability Appraisal for Alderholt (pages 145 and 146 – part of the Dorset Council Local Plan Consultation March 2021) cite this issue recommending that any new development must be phosphate and nitrogen neutral. We understand Wessex Water are very concerned about the Fordingbridge developments currently underway which will create maximum capacity on the sewage plant system, without even considering any increased harmful impact further development in Alderholt would have.

Vision of self-containment – the "15-minute neighbourhood principal" Page 59 of the DAS, and TA 5.12 aspire to ensure Alderholt including the proposed new development meets this target. However, much of the "vision" facilities are not achievable nor sustainable without a far greater population and financial commitment from hard pressed Local Authorities. Fordingbridge although expanding has seen a steady decline in retail and other services ie difficulty in getting an NHS dentist, closure of shoe repairers, lack of clothing retailers, we believe that the self-containment of Alderholt is unrealistic. There will be a greater number of car journeys not only within the expanded Alderholt where people use the car for trips greater than 400m, but with the level of employment only being in the range of 10% to 20% of the increased population, the result will be many more outward commuting journeys. This does not reflect a "15-minute neighbourhood".

Other issues raised are the ability to satisfactorily Police such a large development, and in view of the rural road network, how are the emergency vehicles ie more call outs with a more than ad doubling of the village size, be able to access Alderholt in a timely manner?

Developing Neighbourhood Plan (NP) In March 2019 Alderholt became a designated Neighbourhood Plan Area, and subsequently we have been working on producing a NP. The basis for this has been to identify the actual housing need for Alderholt and to translate this into the number of dwellings required over an anticipated 12-year plan period, based on current data. See attached "Housing Target Paper" 9 March 2023.

Conclusions

The Parish Council strongly objects to this application as it outside the village envelope and as such is contrary to the existing East Dorset Core Strategy and Local Plan Policies.

This conclusion is reached based on the above considerations, and that in the 2017 Alderholt residents survey that garnered 460 responses, only a small proportion of residents (10%) considered that over 200 dwellings would be appropriate, with this response being reflected in the later 2019 household survey. Added to this, the advancing Neighbourhood Plan is being based on the anticipated actual need for housing in Alderholt.

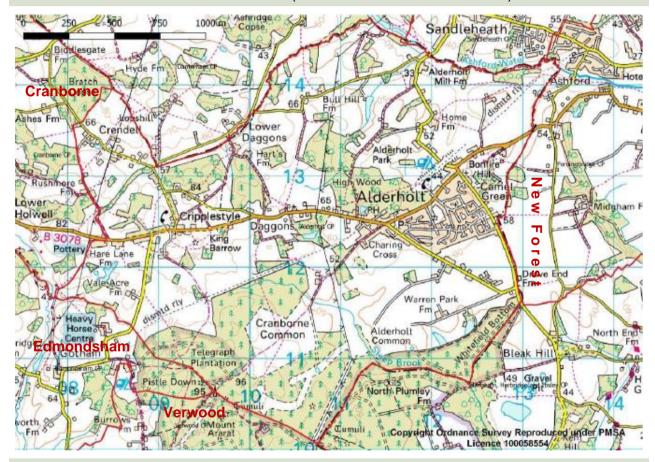
ALDERHOLT NEIGHBOURHOOD PLAN HOUSING TARGET PAPER

09 MARCH 2023

This paper looks at the potential basis for setting a housing target for the Alderholt Neighbourhood Plan in the Dorset Council area (and formerly East Dorset District).

Dorset Council have been consulted on the method and findings, and agreed the basis for the target as appropriate at this stage.

1. NEIGHBOURHOOD PLAN AREA (DESIGNATED MARCH 2019)



2. ADOPTED LOCAL PLAN

- 2.1 The current adopted East Dorset and Christchurch Core Strategy (2014) puts Alderholt as one of the area's Rural Service Centres. These 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" under Policy KS2. This in effect classes it as one of the larger rural settlements in East Dorset, 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, which enables housing infill within that area.
- 2.2 The Housing target (in Policy 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
- 2.3 This comes to a total of about 8,490 dwellings over the 15 years (as referenced in Policy KS4), the equivalent of 566 dwellings per annum (dpa). Appendix 1 makes clear that there was no intent to split this between the two constituent authorities "As there is a single target it is necessary to provide a single housing trajectory combining delivery over the two authority areas".
- 2.4 The local plan 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 references Alderholt as having a village envelope
- 2.5 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. 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).
- 2.6 With reference to adjacent communities, Alderholt adjoins Cranborne, Edmondsham and Verwood parishes in East Dorset (with New Forest district to the east). 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 as a main settlement where a new neighbourhood is planned. As such, the only 'adjacent community' within the Local Plan area but outside of the parish, that may look to Alderholt to meet some of its needs would be Edmondsham. But this is not clear-cut given the surrounding parishes, and even for Edmondsham limited development would be considered acceptable under Policy KS2 provided that it "supports the role of the settlement as a provider of services to its home community".

3. LOCAL NEEDS ASSESSMENT

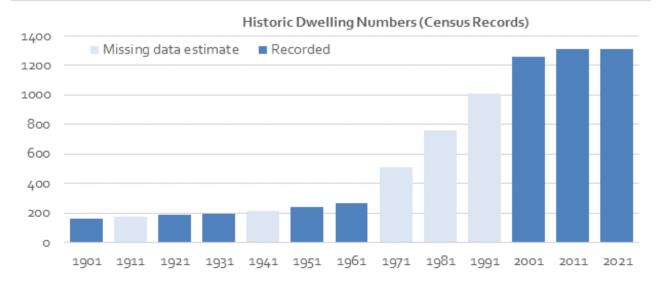
- 3.1 Alderholt Parish Council undertook a household survey in March / April 2017. A total of 460 responses were received, representing just over one third of all households in the parish. A further household survey was undertaken in Summer 2019, achieving a similar level of response.
- 3.2 When asked 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.

- 3.3 The 2019 household survey took the opportunity to examine local needs in more depth. Residents were asked if someone in their home, or immediate family living away, would be likely to require an affordable home in the Alderholt area in the next 10 years. From the 420 households who responded (which was about a third of all households in the parish), there was a need for 77 affordable homes identified (20 to rent, 47 to buy and 10 intermediate / shared equity). Only 4 of the households responding to the survey said that they were already on the Dorset Council affordable housing register. On this basis, whilst it would be reasonable to assume that the actual demand is likely to be significantly higher (taking into account the response rate), it is possible that some of the need apparent from the survey includes households who could potentially access housing on the open market or choose to locate outside of the area, as well as an element of double counting.
- 3.4 At around that time (June 2019), Dorset Council's Housing Register identified just 8 households who would qualify for an affordable home, of which 7 were already living in the village. The main need was to rented housing. Dorset Council undertook a major overhaul of their Housing Register in late 2021, requiring households to re-register (and therefore eliminating households that were on the register but no longer in actual need). A new allocation policy was also introduced with slightly more flexible rules for people joining the register, which lead to an increase to the number of households now on the Register in most East Dorset areas. An update from the Housing Register was requested in December 2022, and this identified 18 households who would qualify for an affordable home and who had declared a connection to Alderholt, with a further 8 applications not yet assessed. Given the 2019 survey this is considered to be a more accurate estimate and still potentially less than the actual level of need.

Dorset Council Housing Register	Affordable dwellings needed					
(December 2022)	1 bed	2 bed	3 bed	4 bed	5 bed	n/k
Households with a local connection to Alderholt	7	4	6	0	1	(8)

3.5 The latest viability evidence¹ suggests that major development sites (of 10 or more dwellings) should be sufficiently viable to provide 35% of the housing mix as affordable homes, including some social rented homes for those in greatest need and allowing for higher standards of design and sustainability. Therefore a site for (say) 20 homes would be expected to deliver 7 affordable homes under normal circumstances.

4. HISTORIC GROWTH



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¹ Dorset Local Plan Viability Assessment, May 2022, Three Dragons https://www.dorsetcouncil.gov.uk/-/dorsetcouncil-area-viability-assessment

- 4.1 Census records² indicate that the population of the village was reasonably stable at around 700 persons (200 households) in the first part of the 20th century. The limited size of the village before World War II is reflected in its lack of any Listed buildings within the village envelope.
- 4.2 The railway closed in the mid-1960s, following which there was a period of further growth (assisted by the installation of mains drainage in the 1970s).
- 4.3 The most recent Census suggests very little change in the population size and number of households in the last 10 years. This is confirmed through monitoring records on dwelling completions that exist from the beginning of this century³. These suggest that recently building rates have consistently been around 3 to 4 dwellings per annum.



5. EMERGING LOCAL PLAN

- 5.1 The (now abandoned) draft East Dorset Local Plan Review⁴, which published an options paper for consultation in mid 2018, proposed a housing target of 8,854 dwellings over 20 years (equivalent to 442dpa) a significant uplift on the adopted core strategy. The draft plan looked to change the spatial housing strategy by identifying land adjacent to the Rural Service Centres of Alderholt, Cranborne, Sixpenny Handley, Sturminster Marshall as part of the overall housing provision, plus a very minor level of development in the smaller villages of Wimborne St Giles, Edmondsham and Hinton Martell. However, having been withdrawn at a relatively early stage, as Dorset Council took the decision in June 2019 to commence work on a single Dorset Council Local Plan, this draft plan's strategy and housing target cannot be given any meaningful weight.
- 5.2 . The Dorset Council Local Plan⁵, which has been through one consultation (January 2021), will eventually replace the Christchurch and East Dorset Core Strategy. Only limited weight can be afforded to this emerging Local Plan at present, given its early stage (the plan is not expected to be examined until 2025). The Plan proposes a target of 1,793dpa across the plan area. Dorset Council acknowledges that this target will be revised in the next version of the Plan, based on the latest available housing figures and standard methodology. It is also relevant to note that the Government has indicated as part of its latest consultation (December 2022)⁶ that the standard method is due to be reviewed in 2024 after the new household projections data based on the 2021 Census are published, and that they are considering making it clearer that the derived figure is advisory and what demographic and geographic factors may be used to

 $^{^2}$ As sourced from $\underline{\text{http://www.visionofbritain.org.uk/unit/10447550/cube/TOT}$ POP and $\underline{\text{https://www.ons.gov.uk/visualisations/customprofiles/draw/}}$

³ Based on previous monitoring records published by Dorset Council up to 2014, and monitoring records since 2015 supplied by East Dorset District Council / Dorset Council - completions data for 2014/5 was not available at the time of writing this report.

⁴ https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/reviews-of-the-plans-from-the-former-council-areas/east-dorset-and-christchurch-local-plan-review

⁵ https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan/about-the-dorset-council-local-plan-january-2021-consultation

⁶ https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy

demonstrate exceptional circumstances to deviate from this. As such there is some degree of uncertainty as to what the final housing target figure may be.

- 5.3 The potential level of housing proposed for Alderholt is expressed as two possible options:
 - Option 1: Small-scale expansion on land between Hilbury and Ringwood Roads (around 300 new homes and 0.25ha commercial)
 - Option 2: Significant expansion comprising a series of sustainable urban extensions around the settlement to create a self-contained 'town' (to be quantified).
- 5.4 The draft plan identifies a Dorset-wide housing land supply of 39,285 dwellings (Figure 2.7) against a requirement of 30,481 dwellings. This does not include either option for Alderholt in these figures.
- 5.5 Appendix 2 includes the housing requirement figures for designated neighbourhood plan areas, based on the sum of: completions since the beginning of the plan period; extant planning permissions; adopted housing allocations; capacity on major sites (of 10 or more dwellings) within development boundaries as evidenced through the SHLAA; and a windfall allowance on minor sites (of less than 10 dwellings). The proposed housing allocations within this draft local plan have been included within this total. The figure provided for Alderholt is 192 dwellings over the 17 year plan period, equivalent to 11.3 dwellings per annum. This was calculated by adding together the number of extant consents (139) with a windfall allowance (53). The appendix also makes clear that "The figures should be viewed as minimum requirement figures and, therefore, can be exceeded. There is no requirement for neighbourhood plans to allocate sites or identify any additional land to meet the overall Local Plan housing need figure."

6. LATEST HOUSING NEEDS ASSESSMENT (DORSET COUNCIL)

- 6.1 Data from the published Local Housing Needs Assessment for the emerging Dorset Local Plan⁷ calculated a potential housing figure for the East Dorset area as 516dpa, capped at 455dpa⁸.
- 6.2 However, these statistics can be updated based on more recent data from the Office for National Statistics (ONS). This includes updated median house prices, median workplace-based earnings, and the ratio between the two (as 15.05). Based on this information, the housing need figure for East Dorset calculated using the standard method figure for 2022 onwards will be 458dpa. The calculation is shown below:

Step 1 - Projected Household Growth, 2022/3 to 2032/3

East Dorset = 43,573 - 40,304 = 3,269 over 10 years = 327dpa

Step 2 - Affordability Adjustment

East Dorset = 327dpa x $((15.05 - 4) \times 0.25 + 1) = 553$ dpa

Step 3 - Capping Adjustment

Capped at the higher of either:

40% above the projected household growth = 327 x 1.4 = 458dpa; or

⁷ <u>Dorset and BCP Local Housing Needs Assessment,</u> Iceni Projects Limited on behalf of Bournemouth, Christchurch and Poole and Dorset Council, November 2021

⁸ the household growth figure (set out in Table 5.2) is 325 dwellings per annum for the former East Dorset area. The report then factors in an affordability adjustment (set out in Table 5.3), which raises the figure to 516. It then considers whether this exceeds the 40% 'cap' at that level (Table 5.4), which it would do (as the East Dorset figure is 455). It goes on to note (in para 5.20 – 5.21) that consideration can still be given to whether a higher level of need could realistically be delivered, as applying a cap does not reduce housing need itself.

⁹ Available from

https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedianandmed

 $[\]underline{https://www.ons.gov.uk/people population and community/housing/datasets/ratio of house price towork place based earning sfor former local authorities$

- 40% above the Local Plan housing requirement figure (not applicable as there is no equivalent figure for the East Dorset area)
- 6.3 Putting aside the adopted spatial strategy, and assuming a pro-rata apportionment based on Alderholt's comparative size to the rest of the East Dorset area (based on the latest available Census data for households¹⁰), would suggest a target of around 15dpa. This is not dissimilar to using the same calculation basis as applied to the emerging Dorset Local plan target and Dorset-wide area. A slightly higher figure of 16.1dpa is produced if a population-based pro-rata assessment (given Alderholt's slightly younger demographic and larger household size).

	Dorset Council LP (draft)	LHNA (2022-based)
Overall target	1,793dpa	458dpa (capped)
Pro-rata basis	Alderholt = 1,312	Alderholt = 1,312
(2021 Census households)	Dorset = 169,261	East Dorset = 39,984
	1,312 / 169,261 = 0.78%	1,312 / 39,984 = 3.28%
Potential target	1,793 x 0.78% = 13.9dpa	458 x 3.28% = 15.0dpa
Pro-rata basis	Alderholt = 3,187	Alderholt = 3,187
(2021 Census population in	Dorset = 371,738	East Dorset = 90,562
households)	3,187 / 371,738 = 0.86%	3,187 / 90,562 = 3.52%
Potential target	1,793 x 0.86% = 15.4dpa	458 x 3.52% = 16.1dpa

7. EXTANT HOUSING SUPPLY

7.1 As of April 2022, the following extant permissions provide a potential housing supply of 138 dwellings, including some affordable housing:

Address	Application Ref	Granted	Dwellings	АН
Alderholt Surplus Stores, Daggons Road	3/11/0558/REM	24/03/2015	89	0
Land north of Ringwood Road	3/16/1446/OUT	06/11/2017	44 (net)	7
29 Ringwood Road	3/19/1135/FUL	08/08/2019	1	0
58 Ringwood Road	3/19/2171/OUT	13/01/2020	4	0

- 7.2 The largest site (a brownfield site that was pervious the Surplus Stores) has remained extant for a number of years, with a material start having commenced. Most recently a non-material amendment in September 2021 was approved in January 2022, submitted by Antler Homes PLC, a housebuilder based in Surrey and operating across southern England. The potential developer has indicated to Dorset Council that they anticipate the housing will be completed between 2024 2027. Unfortunately due to viability issues, the requirement for affordable housing to be provided as part of the scheme was removed (East Dorset Planning Committee Decision 24 May 2016). Whilst this site has taken many years to come forward, it is clear that there is continued developer interest in its delivery and that it is reasonable to assume that it will come forward in the short to medium term.
- 7.3 A reserved matters application for the site north of Ringwood Road was submitted in October 2019 (3/19/2077/RM), but remains under officer consideration. The reserved matters application indicates the provision of 15 dwelling units as affordable, comprising a mix of 1, 2 and 3 bedroom homes, but a subsequent application (P/MPO/2022/02469) was put forward to reduce the amount of affordable housing to 7 units on viability grounds (due to the requirement to provide suitable alternative natural greenspace). This was agreed at the Eastern Area

¹⁰ Based on data extract from the 2021 Census tables TS001 and TS003 https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?collapse=yes and relevant Census Output Areas

Planning Committee on 22 February 2023. The application was submitted by Pennyfarthing Homes, a housebuilder based in Hampshire.

7.4 A reserved matters application for the site at 58 Ringwood Road has also been submitted, validated 13/01/2023 (P/RES/2023/00142), and similarly remains under officer consideration.

8. HOUSING TARGET - INITIAL CONCLUSIONS

- $8.1\,$ The above statistics would suggest an appropriate housing target for Alderholt falls within the range of 4-16dpa. Given the extant affordable housing need (and potential for additional households requiring affordable housing who are not currently shown on the Housing Register), and desire to boost housing growth, it would be prudent to look at a figure towards the higher end of this range.
- 8.2 Based on a 12 year plan period (2022 2034), which would mean that the plan would last 10 years from potentially being made in 2024, a provisional housing target of 16dpa (at the very upper end of the range) would equate to 192 dwellings. Deducting the extant housing supply from this total, the Neighbourhood Plan should seek to make provision for about 50 dwellings in total (taking into account that there will continue to be some infill within the settlement that will contribute to this supply). Allocating one or more sites that will deliver at least 10 dwellings as part of this supply should ensure that those sites would deliver at least 35% as affordable housing as part of the housing mix.
- 8.3 This target could be decreased if looking at a shorter plan period, or increased if the period was extended beyond 2034. The potential for affordable housing rural exception sites can also be investigated to boost the provision of such homes.
- 8.4 It is suggested that the plan (and housing target) should be reviewed within 5 years of the plan being made, in order to consider both the Local Plan target (which is expected to be confirmed in 2026) and whether any further allocations may be necessary. This would include checks on the progress of both the extant consents and site allocations, as well as consideration of extending the plan period to match that of the Local Plan.

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