

Alderholt Neighbourhood Plan

Regulation 16 consultation

Response on behalf of Dudsbury Homes

June 2024



SMARTER DEVELOPMENT

Hillview Business Centre
2 Leybourne Avenue
Bournemouth
Dorset
BH10 6HF

Appendices:

A - Copy OF Alderholt Meadows masterplan as submitted with planning application
P/OUT/2023/01166

| | |
|---------------------|------------------|
| Report Presented by | Intelligent Land |
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1. Introduction and background

1.1 Intelligent Land, on behalf of Dudsbury Homes submits a formal objection to the Alderholt Neighbourhood Plan Regulation 16 consultation.

1.2 This statement is part of the online response questionnaire and outlines Dudsbury Homes objection citing non-compliance with two nationally prescribed Basic Conditions.

1.3 Dudsbury Homes holds options on significant land in Alderholt. A planning application was submitted in February 2023 and registered on 28th March 2023 (Application Reference: P/OUT/2023/01166).

1.4 The application

is for an outline mixed-use development including up to 1,700 dwellings with affordable housing and care provision, 10,000sqm of employment space, a village centre with retail, commercial, community, and health facilities, open space, biodiversity enhancements, a solar array, new roads, and associated infrastructure. (All matters reserved except access from Hillbury Road).

1.5 The application is currently under appeal, scheduled for an Inquiry on 25th June 2024. The appeal proposes:

- Up to 1700 homes including affordable housing and 80 bed care home
- 10,000sqm of employment space in a business park (Class E Commercial, Business and Service uses)
- Village centre with associated retail, commercial, community and health facilities (4,000sqm of Class E Commercial, Business and Service uses)
- Open Space and Suitable Alternative Natural Greenspace (SANG) including an extension to Alderholt Recreation Ground; children and young people's play, natural and semi-natural greenspace; allotments; and three areas of SANG
- Biodiversity enhancements of more than 10% net gain
- Solar array, as part of the energy strategy for the site



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- Access from a new roundabout on Hillbury Road (detailed)

1.6 The table below provides a breakdown of the various proposed land uses:

| LAND USE | AREA (m2) | AREA (Ha) | PERCENTAGE (%) |
|---------------------------------------|-----------|-----------|----------------|
| * SANG | 538,796 | 53.88 | 44% |
| * Neighbourhood | 389,933 | 38.99 | 32% |
| * Green Corridors | 66,884 | 6.69 | 5% |
| * Potential Solar Array | 65,172 | 6.52 | 5% |
| * Alderholt Meadows Recreation Ground | 49,200 | 4.92 | 4% |
| * Parks | 44,589 | 4.46 | 4% |
| * Allotments | 15,703 | 1.57 | 1% |
| Employment | 17,000 | 1.70 | 1% |
| Local Centre/Hub/Market Square | 11,843 | 1.18 | 1% |

| | | | |
|---|-----------|--------|------|
| TOTAL SITE AREA WITHIN APPLICATION SITE RED LINE BOUNDARY | 1,218,709 | 121.87 | 100% |
| Including Highway and Road Infrastructure | | | |

1.7 Dudsbury Homes supports the community's efforts to produce a Neighbourhood Plan for Alderholt and has engaged at all consultation stages. However, the Steering Group has not sought any meetings with Dudsbury Homes to discuss its responses in detail.

1.8 This lack of engagement has led to a formal objection based on the plan's failure to comply with two "Basic Conditions", which will be tested at Examination. These objections are set out below.

2. Responses on the basic conditions

2.1 The Basic Conditions for any Neighbourhood Plan are outlined in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

2.2 Dudsbury Homes objections are based on non-compliance with the following two Basic Conditions:

the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)

2.3 This response sets out Dudsbury Homes objections on each.

Failure to achieve sustainable development

2.4 It is essential that the Neighbourhood Plan can deliver against its vision and objectives, both of which seek to enable the village to retain and enhance its amenities and facilities, including recreation space, which preserving its rural character.

2.5 The vision and objectives are, in themselves a direct response to concerns about lack of facilities, services and transport links, raised during preparation of the Neighbourhood Plan:

Main Issues & Concerns from the 2022 Focus Day:

Level of Growth

People's main concerns centred around the potential scale of growth being proposed, and the impact on the village and its facilities. If additional houses are built this should include social housing that is genuinely affordable to local people. Many people felt that the existing consents should be progressed first – particularly the Surplus Stores site as this is brownfield land.

Transport Impacts

People highlighted the lack of any realistic and viable alternatives to the car. They were concerned that the local highway network is inadequate for major traffic increases and pointed out problems with speeding traffic. Better public transport and better traffic management (speed and HGV restrictions) may help. The railway could also provide a safe cycling route (but this would be unlikely to operate as an effective alternative to the car)

Leisure and Facilities

Some people suggested that the village could benefit from additional facilities – such as a gym or skate park, a youth club. Another common theme was the need to improve the network of footways for getting around the village. There were concerns about the capacity in the local schools, access to healthcare, and the reliability of the internet / broadband connections.

- 2.6 Whilst concerns have been raised about levels of growth which might be appropriate for the village in the future, it is clear below that the aspiration and strategy of the Neighbourhood Plan is to deliver enhanced amenities and infrastructure for the village as well as affordable housing and transport links.

Our Vision

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.



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Our 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.*
- *Reinforce the sense of a village centre/high street.*
- *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.*
- *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.*
- *Protect the intrinsic beauty and enjoyment of the countryside and approaches to Alderholt*
- *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.*

- 2.7 There is however a clear disconnect between the vision and objectives of the Plan and its delivery strategy. From the outset, the Plan has only ever considered very modest levels of growth. It is noteworthy that the first discussion of future growth of the village occurs on page 38 of a 78-page plan.
- 2.8 The Plan puts forward additional housing growth of just 50 dwellings over the 12-year plan period, in addition to a number of sites which have been granted consent or allowed on appeal. This is despite the development plan context of identifying Alderholt as a “rural service centre”.
- 2.9 At no point during preparation of the Neighbourhood Plan has the Steering Group been open to consideration of any alternative development strategy. As set out above there has been no attempt to engage with Dudsbury Homes, despite the knowledge of the submitted planning application and appeal.

2.10 This is regrettable for two main reasons:

Firstly, should the upcoming appeal be allowed, it will effectively create the need to entirely redraft much of the Neighbourhood Plan; and

Secondly, the Plan, if pursued based on minimal development, will fail to achieve its vision and objectives of creating a more sustainable village.

2.11 The first issue rests with the Inspector who will consider the appeal on the Alderholt Meadows proposals. The second issue is however directly relevant to this objection.

2.12 This second matter is critical to the plan because it is a clear theme of the Plan to enhance local services and facilities for the benefit of the local community. Indeed, the Plan makes clear the demand for such service improvements from its own resident's consultation:

4.2.2 The 2019 village survey sought to understand local priorities for new facilities. The top priorities expressed by local residents were:

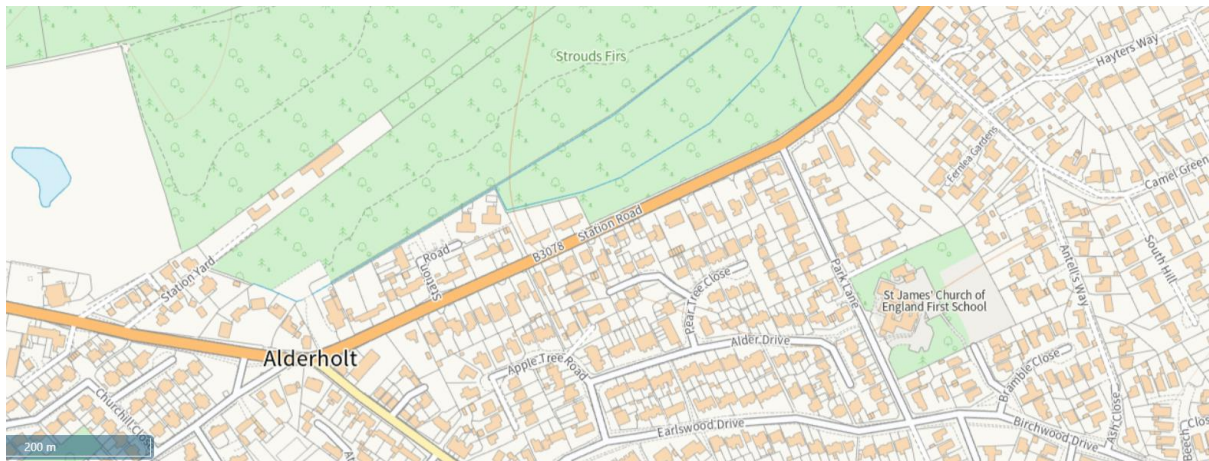
- Better bus services
- Wider range of local shops
- Healthcare (in particular a GP surgery in the village)
- Improved footpaths / traffic management
- Local schools
- Gym / sport and leisure / skate park (with the latter being a higher priority for households with children).

2.13 The Plan suggests that some of this provision lies outside the planning system, however it also proposes the creation of a new "high street" (Policy 8). The preamble to this policy sets out this key aspiration and how it is to be achieved:

4.2.4 One of the key objectives of this Neighbourhood Plan is to reinforce the sense of a village centre / high street. Most of the facilities are located along Daggons Road / Station Road and at the junction with Ringwood Road. It is this part of the village that formed its historic base and continues to act as the village centre / high street, albeit not as well as it could. As such, where infill sites come forward within this area, they should be redeveloped in a way that would allow the properties to be used as shops and other services (albeit they may be used as a dwelling). This would allow

such uses to locate here more readily, and increase the general vitality and viability of these facilities as the area becomes more of a village 'High Street'. Whilst alternative options for a 'new' village centre away from this area have been suggested by some land promoters, locations that are not on the main through route would be less likely to succeed, and would have little regard the village's historic character.

2.14 Dudsbury Homes repeats its objection to this approach in two respects. Firstly the existing character of Daggons Road/Station Road offers very few opportunities to create new development. Even a rudimentary examination of the Ordnance Survey mapping for this part of Alderholt demonstrates that the southern side of Daggons/Station Roads is already entirely developed with no obvious infill opportunities, whilst much of the northern side of the road is woodland.



2.15 This raises the obvious question – how will this “High Street” be created in practice? Whilst it is acknowledged that the presence of through traffic can be beneficial in supporting local shops and facilities, there appears to be no real achievable opportunity to create an attractive village centre in this location, and the presence of fast-moving traffic is likely to detract from this proposal further rather than offer any benefit. The Plan does not allocate any sites on Station Road/Daggons Road for high street uses, and if a site did come forward it is almost certain to be developed for housing with no obvious means of securing a commercial use.

2.16 Secondly, and perhaps more critically, the level of development proposed in the plan will not sustain the creation of new shops and services of any kind, let alone a “high street”. There are references throughout the Plan to the lack of local services:

What is this all about section - To remain a thriving village, we are also supporting the retention and possible expansion of local services and community facilities

Issues from the 2022 focus day - People highlighted the lack of any realistic and viable alternatives to the car.

Issues from the 2022 focus day - There were concerns about the capacity in the local schools, access to healthcare, and the reliability of the internet / broadband connections.

4.2.1However the village lacks a number of locally based services (such as a library, hairdresser and pharmacy), the local Doctor's practice no longer operates its branch surgery, and larger facilities such as secondary schools and leisure centres are only found in the larger towns.

4.2.14 Employment opportunities within the parish are limited

Policy 15 - Every effort should be made to avoid the loss of retail premises, leisure and other local facilities.

2.17 Addressing these issues requires a level of growth that can both drive and fund improvements to local services and infrastructure and sustain these in the long term. The history of recent development in Alderholt, including those sites included in the 192 dwelling housing figure in the Plan, is of modest incremental development, often unplanned, which fails to deliver anything for the village, and indeed exacerbates the decline in local services, as evidenced in the Plan.

- 2.18 Regrettably however, the Plan's strategy simply reinforces this pattern. Just 50 additional dwellings are proposed, but worse, these are spread over 3 sites of 20, 15 and 15-20 dwellings respectively. One of these sites is also required to make provision for 0.2 hectares of employment development, a significant challenge on a small housing site.
- 2.19 Equally the Plan is not supported by any viability testing to demonstrate how these modest sites will be able to deliver required mitigation for nutrient neutrality, impacts on heathland, and biodiversity net gain, as well as providing affordable housing. The allocation at Blackwater Grove (site 14) includes a SANG, however the area identified is too small to function as a SANG, against the criteria in the development plan, and again it is unclear how this greenspace will be funded.
- 2.20 It is also noted that sites allocated in the north west of Alderholt have the potential to attract recreational pressure on Cranborne Common given their close proximity to the bridleway.
- 2.21 It is quite apparent that the lessons of the past have not been learned in the Neighbourhood Plan, and that aspirations to arrest the decline in services, and to create a new high street are hollow and undeliverable.

Conformity with the Development Plan

- 2.22 The pattern of decline conflicts with the Christchurch and East Dorset Core Strategy 2014, the statutory Development Plan for Alderholt
- 2.23 Although dated, the Core Strategy remains relevant, with the published timetable for a new Dorset Council Local Plan suggesting that work will restart at the earliest in late 2024 with adoption some time in 2027.
- 2.24 The Core Strategy designated Alderholt as a rural service centre under Policy KS 2

Policy KS2

Settlement Hierarchy

The location, scale and distribution of development should conform with the settlement hierarchy, which will also help to inform service providers about the provision of infrastructure, services and facilities.

| Settlement Type | Function |
|-----------------------|--|
| Main Settlements | The settlements which will provide the major focus for community, cultural, leisure, retail, utility, employment and residential development. This will include infill development as well as options for some greenfield development. |
| | Christchurch, Wimborne Minster, Ferndown and West Parley, Verwood, Corfe Mullen |
| District Centres | Settlements which will provide for smaller scale community, cultural, leisure, retail, employment and residential development within the existing urban areas. |
| | West Moors, Highcliffe |
| Suburban Centres | Settlements with no existing centres that will provide for some residential development along with community, leisure and retail facilities to meet day to day needs within the existing urban areas. |
| | Colehill, St Leonards and St Ives |
| Rural Service Centres | 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. |
| | Alderholt, Cranborne, Sixpenny Handley, Sturminster Marshall, Three Legged Cross |

| Settlement Type | Function |
|-----------------|---|
| Villages | Settlements where only very limited development will be allowed that supports the role of the settlement as a provider of services to its home community. |
| | Burton, Hurn, Edmondsham, Furzehill, Gaunts Common, Gussage All Saints, Gussage St Michael, Hinton Martell, Holt, Horton, Longham, Shapwick, Wimborne St Giles, Witchampton, Woodlands/Whitmore |
| Hamlets | Settlements where development would not be allowed unless it was functionally required to be in the rural area. |
| | All other settlements |

2.25 Whilst it appears that Alderholt is a settlement which falls in the fourth tier of the settlement hierarchy, the reality is that the hierarchy is more clearly divided between more urban settlements and those in rural areas. For example, tier 1 (main settlements) covers the main urban towns of East Dorset, as well as the Christchurch urban area. Tiers 2 and 3 also relate closely to these urban areas – for example Colehill is effectively a suburb of Wimborne, and Highcliffe similarly part of Christchurch – hence these tiers are given “urban” definitions of district and suburban centres.

- 2.26 Tiers 4-6 apply to rural settlements, with Alderholt in the highest tier of “Rural Service Centres”, with only limited or no development proposed at villages and hamlets. Rural Service Centres can therefore be seen as having a role that is distinct from and not subservient to, urban district or suburban centres. On this basis, they are described as *“providers of community, leisure and retail facilities to support the village and adjacent communities”*. (emphasis added).
- 2.27 In terms of the settlement hierarchy it is clear therefore that Alderholt has a role and function to provide services and facilities to serve both its own needs and those of adjoining smaller settlements, which would include for example Cranborne and Edmondsham.
- 2.28 It is also clear that the policy foresees the permission for residential development which will sustain this role and function. Whilst not specific, the policy permits residential development *“of a scale that reinforces their role”* as the providers of the facilities above.
- 2.29 As a document that will form part of the Development Plan, and thus must be in conformity with it, it follows that the Alderholt Neighbourhood Plan must also permit a scale of residential development which reinforces Alderholt’s role as a rural service centre.
- 2.30 It does not.
- 2.31 As stated above, the Plan acknowledges that the village services and facilities have declined over time and are failing to meet the needs of even the residents of Alderholt itself, let alone fulfilling the needs of adjoining smaller settlements. In certain instances, the Plan appears actively to resist improvement of services and facilities. The creation of the “high street” is not supported by any allocation, and the school playing field is designated as a Local Greenspace which could inhibit further expansion of the school if required.

2.32 The Plan, however, does not attempt to address this issue, instead allocating 3 small sites totalling 50 dwellings, yet somehow expecting these sites to bear the burden of providing significant affordable housing, infrastructure and services. This is not a credible strategy and more significantly is in direct conflict with Policy KS2 of the Christchurch and East Dorset Core Strategy.



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3. Conclusions

- 3.1 Dudsbury Homes regrets submitting formal objections, given its investment in a sustainable future for Alderholt through Alderholt Meadows.
- 3.2 Despite engaging in the Neighbourhood Plan process, the Steering Group has not discussed Dudsbury Homes' responses, indicating a closed mind to development options.
- 3.3 More regrettable however is that this approach will simply lead to “more of the same” for Alderholt. More drip feeding of housing which delivers little or nothing for the village, thus perpetuating a pattern which has existed for decades. More decline in services and facilities, with the modest housing only adding to pressure on schools and health facilities already in decline. Overall, a lost opportunity to change the narrative and look to a sustainable future.
- 3.4 In this regard it is quite clear that the Alderholt Neighbourhood Plan fails to comply with two of the Basic Conditions set down in statute. On that basis, Dudsbury Homes requests that the Examiner finds the Plan unsound and requests the Steering Group to reconsider more appropriate options for future growth which are appropriate to sustaining Alderholt as a rural service centre.

