

Alderholt Neighbourhood Plan

Responses to the Regulation 16 consultation

The Regulation 16 consultation was held between 15 May and 25 June 2024 (6 weeks). Thirty-two responses were received during this time, as detailed in the table below.

No.	Name	Organisation	Date submitted
1		Sport England	24 May 2024
2	D Stuart	Historic England	2 June 2024
3	G Gallacher	National Highways	5 June 2024
4	R Burden	Cranborne Chase National Landscape	18 June 2024
5	B Sherrard	Environment Agency	21 June 2024
6	R Tuck	Natural England	24 June 2024
7	S Croft	South West Water	24 June 2024
8	D Brooks	Resident	15 May 2024
9	S Hilton	Resident	16 May 2024
10	F Brown	Resident	17 May 2024
11	S Shailer	Resident	17 May 2024
12	M Smethers	Resident	17 May 2024
13	C Walker	Resident	17 May 2024
14	L Fish	Resident	20 May 2024
15	M Hardgrave	Property owner	3 June 2024
16	C Hibberd	Property owner	5 June 2024
17	S Trueick	Intelligent Land, on behalf of Dudson Homes	14 June 2024
18	T Lawton	Resident	15 June 2024
19	P Atfield	Goadsby, on behalf of Mr & Mrs M Stevens	17 June 2024
20	M Huzzey	Resident	17 June 2024
21	N J Thorne (a)	Landowner	18 June 2024
22	N J Thorne (b)	Landowner	20 June 2024
23	V Huzzey	Resident	21 June 2024
24	J Barnaby	Resident	21 June 2024
25	J Marlow	Resident	23 June 2024
26	R Lofthouse	Pennyfarthing Homes	25 June 2024
27	N Moore	Resident	25 June 2024
28	C Gould	Nova Planning, on behalf of Macra Limited	25 June 2024
29	S Bates	Feltham Properties	25 June 2024
30	M Hawthorne	Highwood	25 June 2024
31	A Bennett	Ken Parke Planning Consultants Ltd, on behalf of Commercial Freeholds Limited	25 June 2024
32	P Reese	Dorset Council	25 June 2024

Representation number: 1

From: Planning Technical Team

Organisation: Sport England

Submitted: 24 May 2024

Comments:-

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 103 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in

turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Representation number: 2

From: David Stuart, Historic Places Adviser

Organisation: Historic England

Submitted: 3 June 2024

Comments:-

Thank you for your Regulation 16 consultation on the submitted version of the Alderholt Neighbourhood Plan.

In our response to the Regulation 14 consultation we drew attention to the need to ensure that potential impacts on heritage assets arising from proposed site allocations were properly identified and avoided or minimised in accordance with best practice and national and local policy for the protection and enhancement of the historic environment (see box below).

We advised the community to liaise with your authority's heritage team on this matter. This may already have taken place, but if not we would take this opportunity to reiterate our advice and assume that any issues identified can or have been satisfactorily resolved.

There are no other issues associated with the Plan upon which we wish to comment.

Dear Nicky [Ashton]

Thank you for your Regulation 14 consultation on the pre-submission version of the Alderholt Neighbourhood Plan.

Our involvement in the preparation of the Plan has been limited, and our interest in any such Plan tends to focus on where sites are proposed for development as experience has shown that these allocation policies have the greatest potential for impact on heritage assets.

In our response to the SEA Scoping consultation last year we drew attention to the need to ensure that the significance of relevant heritage assets was appropriately considered in the selection of any sites for development and the manner in which that development was proposed.

We note that 3 sites are proposed as site allocations (policies 12, 13 & 14) and that the extension of the village envelope is proposed in order to accommodate them (policy 11). It will be important to ensure through the site allocation and assessment process via the SEA that these proposals take appropriate account of relevant heritage assets, and in conformity with overarching national and local planning policy avoid causing harm to the historic environment.

Your community may have liaised with the Dorset Council heritage team in the formulation of these proposals in order to help achieve the above imperative but if not we would strongly encourage such liaison prior to formal submission so that any necessary evidence or modification can be accommodated while the Plan preparation remains flexible.

Otherwise, we note and applaud your community's dedication to preserving and enhancing its distinctive historic character through policies designed to identify and protect this, as well as resources aimed at assisting in informed decision making such as the Character Area appraisal and Design Guidance.

Our congratulations to your community on its progress to date and our best wishes for the making of your Plan.

Representation number: 3

From: Gaynor Gallacher, Assistant Spatial Planner (Highways Development Management)

Organisation: National Highways

Submitted: 5 June 2024

Comments:-

Thank you for providing National Highways with the opportunity to comment on the Reg 16 submission version of the Alderholt Neighbourhood Plan.

National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A31 trunk road which passes approximately 9.5km to the south of plan area. A connection to the SRN is provided via the Alderholt Road to the B3081 Verwood Road/Hurn Lane/A31 junction, which can experience congestion during the network peak hours.

Having reviewed the plan's proposed policies, we consider that these are unlikely to lead to a scale of development that would adversely impact on the safe and efficient operation of the SRN, in accordance with policy contained within DfT Circular 01/2012 *The strategic road network and the delivery of sustainable development*. We therefore have no specific comments to offer on the policies within the plan. However, it should be noted that any large scale development that may come forward within the plan area and has the potential to impact on the A31 will need to be supported by a transport assessment in line with the requirements of DfT Circular 01/2022 and the National Planning Policy Framework. Any impacts on the SRN which are considered severe or unacceptable in capacity or safety terms will require mitigation in line with current policy.

In terms of the emerging Dorset Council Local Plan, we look forward to continuing to work with the Council in developing their transport evidence base to understand the impact of their proposed spatial strategy on the SRN, and any requirements for mitigation at key strategic junctions which may be necessary to accommodate proposed growth.

This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.

Representation number: 4

From: Richard Burden, Principal Landscape & Planning Officer

Organisation: Cranborne Chase National Landscape Partnership

Submitted: 18 June 2024

Comments:-

Thank you for consulting Cranborne Chase National Landscape Partnership.

I note the document includes reference to the revised s.85 duty of CRoW Act 2000, flowing from LURA 2023, that applies to 'relevant authorities'. It appears, therefore, to be fully up to date with regard to National Landscape legislation.

Whilst CCNLP is happy to support the Neighbourhood Plan, it does seem rather strange that in section 4.1 I read that new dwellings would be required to make payments towards the New Forest Recreational Management Plan – relating to an area some miles away – whereas there are no payments proposed for the management of the Cranborne Chase National Landscape – an equally important area nationally - that adjoins the Neighbourhood Plan Area.

Representation number: 5

From: Bob Sherrard, Planning Advisor

Organisation: Environment Agency

Submitted: 21 June 2024

Comments:-

Thank you for consulting the Environment Agency on the Regulation 16 consultation for the Alderholt Neighbourhood Plan.

Having commented previously on this plan we are pleased to see that our previous comments have been taken on board. We therefore have no further detailed comments to make in relation to this plan.

Representation number: 6

From: Rosalind Tuck, Lead Adviser – Sustainable Development

Organisation: Natural England

Submitted: 24 June 2024

Comments:-

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not have any specific comments on this neighbourhood plan.

I can confirm that Natural England have no objection to the proposed Neighbourhood Plan modifications. It would be appropriate for a conclusion of no adverse effect on the integrity of the designated habitats and International sites to be reached

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in Natural England's Standing Advice on protected species .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice.

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

Annex 1 attached on the next 3 pages

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds,

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Representation number: 7

From: Simon Croft, Growth Planning Manager

Organisation: South West Water

Submitted: 24 June 2024

Comments:-

South West Water [SWWL] (trading as Bournemouth Water) comment in response to the Regulation 16 Consultation of the Alderholt Neighbourhood Plan, acting in its function as Statutory Water Undertaker [the Undertaker] for the Alderholt area. SWWL has a duty under the Water Industry Act 1991 to protect statutory assets to provide an effective, efficient and economic water supply, as well as upgrade and improve infrastructure to accommodate development, where suitable. The Undertaker supports Alderholt Neighbourhood Planning Forum in relation to the inclusion of principles promoting water efficiency and water quality within draft policies.

Proposed Policy

With continuing trends of Climate Change resulting in hotter, drier summers and wetter, milder winters (IPPC, August 2021), the need for maximising water efficiency measures is paramount for implementing and maintaining sustainable development. The frequency of extreme weather events is increasingly becoming more regular, including the likes of summers more regularly breaking previous temperature records (WMO, January 2024) as well as flood events. Particularly the increasingly hot and dry summers, water consumption behaviours shift to mitigate these conditions; placing additional stress on the public water supply system, particularly during the summer as the typically period of peak demand.

As such, the Undertaker fully support the inclusion of Policy 5 (Environmental Performance and Sustainability), particularly the promotion of the 'collection of surface water to reuse, either through a water butt or rainwater harvesting system'. By shifting water demand for non-potable water uses (including gardening, car washing, etc.) from the public supply network to utilising locally harvested and stored rainwater, development can assist in maximising the sustainable use of potable drinking water when it is needed.

SWWL would further support the inclusion of policy imposing specific water efficiency standards for new development. The currently adopted East Dorset Local Plan (April 2014) includes Strategic Objectives and adopted policy recognising the importance of implementing suitable water efficiency measures within new development (Objective 3 and Adopted Policy ME3). Within adopted policy, the East Dorset Local Plan imposes the requirement for residential development to be informed by Code for Sustainable Homes Design Categories, and BREEAM standards for non-residential development.

In the event the Alderholt Neighbourhood Plan Forum would consider the inclusion of a similar policy, adding material weight to water efficiency as a factor within the determination of Planning Applications, the Undertaker promote wording similar to that implemented within the Draft Wiltshire Council Local Plan:

'1. new residential development should have a predicted mains water consumption of no more than 85 litres per person per day;

II. non-household development should achieve a score of three credits within the water (Wat 01 Water Consumption) issue category for the BREEAM New Construction Standard, achieving 40% reduction compared to baseline standards'

SWWL would support the inclusion of proposed policy implementing measures in line with the Buildings Regulations 2010 part G guidance of 110 litres per person per day (or successor standards) for residential development, and BREEAM New Construction Standard for non-residential development.

Furthermore, the Undertaker wish to express support for Policy 6 and 7. In terms of policy 6, in conjunction with the water efficiency principle promoted within Policy 5, the inclusion of suitable green space and natural SuDS solutions promote drought resiliency; further supporting sustainable water consumption behaviours. The inclusion of suitable planting that provide wide canopy cover and vegetative screening as part of a green infrastructure plan can promote adequate shading and evaporation control; collectively supporting mitigations of factors that lead to increased water consumption behaviours and maximising the retention of water otherwise lost to evaporation during periods of high temperatures.

SWWL support the inclusion of wording on nutrient neutrality within Policy 7 relating to the River Avon SAC. SWWL as Statutory Water Undertaker work as active stakeholder with regulators and others to improve the condition and water quality of the rivers within its operational area. Both in terms of improving the ecological and environmental value of these rivers, as well as improving the water quality for sources of water abstraction for eventual supply into the public network, Policy aiming to mitigate increased nutrient load of development on aquatic environments is fully supported by the Undertaker.

Drinking Water Assets

The level of development proposed within the draft allocations stated within the Draft Neighbourhood Plan can be accommodated within the existing water supply network and infrastructure. As the allocations progress, if it is determined that any network reinforcements are required, this would be funded through the Infrastructure Charge that SWWL receives from developers.

However, additional infrastructure evaluations of capacity, pressure and other factors would be required for further non-allocated development proposals to identify potential improvement and upgrades necessary to accommodate additional Planning Applications within the parish. Any potential future upgrades required to accommodate, particularly large-scale proposals, would require assessment, and allocation of relevant funding not currently included within the current business plan.

Particularly, if the development Land South of Ringwood Road goes ahead of circa 1,700 dwellings, then work will be required to the water distribution network along Ringwood Road or Blackwater Crescent depending upon the design of the development, which could take up to 18 months to install once construction has commenced. SWWL is currently carrying out a detailed study of the growth in the Alderholt area which will confirm the design and timings of any infrastructure upgrades required to the water distribution network.

Representation number: 8

From: Mr Derek Brooks, resident of Alderholt

Submitted: 15 May 2024

Comments:-

I am fully in support of the plan in its current state as it acknowledges the need to provide some new housing but doesn't threaten the current rural nature of the village.

Representation number: 9

From: Mrs Susan Hilton, resident of Alderholt

Submitted: 16 May 2024

Comments:-

Although broadly in agreement with the plan, on page 49, site 009, I cannot support the main vehicular access to this site being via Blackwater Grove and Blackwater Close. The amount of vehicles during development would be horrendous and pass extremely close to our house. Although we do not object to the area of land being developed, this single access through what is currently a quiet cul-de-sac is not acceptable. Other means of access during development should be considered before this area is included in the plan.

Representation number: 10

From: Mrs Francesca Brown, resident of Alderholt

Submitted: 17 May 2024

Comments:-

Referring to site 009 in the neighbourhood plan, I would like to comment with my objections. I've lived down Attwood close for 8 years, my mum lived in this house prior to myself for 10 years. I know for absolute fact that there is an abundance of wildlife in this field, I have seen it first hand. With lizards coming from the field into my garden, foxes, bats in the evenings, deer, many bird and insect species. Building in this field would be an ecological disaster! On top of this it's stated that Attwood close could give an extra access point to development, this is categorically untrue. This is a small, single lane cul de sac, it is a brick road not tarmac, we've had times when an ambulance couldn't even get down this road. Whoever has stated it would be an appropriate extra access are very much mistaken! We are probably one of the only proper brick roads in Alderholt and we absolutely should not have to give up that beautiful character for yet another development! I believe the other site choices would be more appropriate if building must be done!

Representation number: 11

From: Mrs Susan Shailer, resident of Alderholt

Submitted: 17 May 2024

Comments:-

There are several reasons for my objection to the development of this land. It has a vast selection of wildlife that have lived undisturbed for many years here. There are protected species such as slow worms and newts. We are often visited by foxes who have been seen to climb the fence. Several breeds of owls use this land as hunting ground.

The roads leading to the land via Blackwater Grove and Blackwater Close are narrow and would prove very difficult to manoeuvre large vehicles in and out without damage to neighbouring properties or vehicles. There is a sharp bend as you enter Blackwater Grove which would be dangerous if large vehicles were constantly coming and going. The roads leading in and out of Alderholt have restrictions on the length of vehicles that can use them.

This is not the first time that an application has been made, they have all been turned down previously and so should this be.

Representation number: 12

From: Martin Smethers, resident of Alderholt

Submitted: 17 May 2024

Comments:-

Supporting

Representation number: 13

From: Mr Chris Walker, resident of Alderholt

Submitted: 17 May 2024

Comments:-

The entire document meets with my approval

Representation number: 14

From: Mrs Lindsey Fish, resident of Alderholt

Submitted: 20 May 2024

Comments:-

I am objecting the inclusion of site 009 on page 49 of the plan .This site is outside the village plan. The wildlife will be destroyed if it hasn't already by the cutting down of trees and flattening of the hedgerow by the surprise and un-announced team from Ecological Consultancy/Nick Horn Ltd support services to Forestry on Tuesday 5th March 2024, where a large area of hedgerow flattened where birds were nesting which the Police agreed was unlawful because of bird nesting season from 1st March til August. Many wildlife habitats of protected species such as bats and lizards plus slowworms, hedgehog, snake, mice, birds eggs, etc were destroyed when this "survey" was conducted. The variety of birds there has been recorded and is vast.

Furthermore , there are concerns about the flood effect of cutting down hundreds of trees and replacing them with bricks and concrete. Where does the rainwater drain into from our already drenched and sodden gardens ?

In addition the only access, via the residential areas of Blackwater Close and Blackwater Grove, is totally unsuitable for the large amount of construction vehicles and consequently residential traffic which would result.

Representation number: 15

From: Mrs Mary Hardgrave, property owner

Submitted: 3 June 2024

Comments:-

I own property in Ringwood Rd. Alderholt.

Having studied the Neighbourhood plan and the basic conditions, I fully support the plan.

Representation number: 16

From: Mrs Christine Hibberd, property owner

Submitted: 3 June 2024

Comments:-

I own property in Ringwood Road, although not currently residing there.

I would like to state my support for the plan on the basis that it meets the basic conditions.

Representation number: 17

From: Simon Truick, Managing Director

Organisation: Intelligent Land on behalf of Dudson Homes

Submitted: 14 June 2024

Comments:-

Dudson Homes considers that the Alderholt Neighbourhood Plan does not meet the Basic Conditions prescribed in the relevant schedule to the Town & Country Planning Act 1990 in that it fails to comply with the following:

- the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. Read more about 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). Read more about General conformity with the strategic policies contained in the development plan.

On behalf of Dudson Homes, we set out the reasons for this objection in the attached statement which we wish the Examiner to consider.

Attached Statement follows on the next 14 pages

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.



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- 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.

APPENDIX A

ALDERHOLT MEADOWS MASTERPLAN



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Representation number: 18

From: Mr Tony Lawton, resident

Submitted: 15 June 2024

Comments:-

I have taken some time to review the 78 page Local Plan. I feel that I must express serious concern that this is utterly detached from the demand for new homes, the current economic reality and the needs of residents of Alderholt, particularly the younger generation. Our country is facing a population explosion with gross immigration of 2.5 Million in the past couple of years driving massive demand for lower cost housing.

The proposed 50 homes (in addition to the in process Surplus Stores and Pennyfarthing sites) over the 12 year period to 2034 that are the substance of the Local Plan will not contribute to the achievement of sustainable development. We have lived in the village for 20 years and prior to that in Verwood. The Local Plan is a scaled back re-run of the ad-hoc in-fill development seen in Verwood, without any realistic prospect of a) improved community amenities, b) employment or c) affordable housing / First Homes. These were all key requirements of the Parish Council's Local Needs Assessment review.

i) 50 new homes split across the proposed 3 sites will necessitate relatively small scale development of 15-20 homes per site.

ii) The referenced 35% -50% of affordable housing/First Homes on such small scale sites will not be economically viable. Developers will look to ensure build quality consistent with existing /ongoing local new developments. 3- 4 bed homes at prices upwards of £500,000 mixed in with a relatively large % of "affordable homes" will not be commercially attractive to developers or indeed economically viable.

iii) The Local Plan makes reference to the "First Homes" scheme where prices are capped at £250,000 and subject to other criteria: the reality is that even if such homes are mixed into the proposed 3 small scale sites that the £250,000 price would be the threshold price of these units (as is the case at the local Pennyfarthing Whitsbury development with First Homes marketed at £249,995 net of the 30% discount). First Homes prices at this level bear no co-relation whatsoever to local earning levels of the younger generation that are desperately need of such housing.

iv) There is no realistic prospect of delivery of enhanced amenities or local employment. The Local Plan (S 4.2.2) refers to the re-enforcement of a sense of village centre /high street centred along Daggons Road and Station Road/ the junction to Ringwood Road with this area to become " more of a village High Street" through in fill development. Where exactly are the viable in-fill site opportunities in this area to provide local shops, amenities or employment ? The reality is that any such sites would be small and fall to additional 2 -5 house in-fill development ; Verwood revisited.

Alderholt requires a level of growth to fund improvements to infrastructure, local services & the realistic delivery of affordable housing/ First Homes. The Local Plan falls woefully short on all of these requirements with no realistic financial/ viability assessment. The dubious prospect for 10-20 "affordable homes" at best over the period to 2034 pays scant regard to the needs to the younger generation in the village who's only other option is to leave the village whilst facing into enormous demand nationally for such starter /family homes.

I would respectfully request that this Local Plan at a minimum requires further review under a Referendum with the residents of the village. As a part of this process the Parish Council should ensure full transparency and restatement of the Local Needs Assessment review to include that all residents are made aware of the sparse number of affordable homes included to the plan through 2034. Those residents with children aged 15-30 living at home can then make their decisions on the Local Plan accordingly.

Representation number: 19

From: Mr Peter Atfield, Director

Organisation: Goadsby, on behalf of Mr & Mrs Stevens (Alderholt residents)

Submitted: 17 June 2024

Comments:-

Please see the attached representations.

Attached Statement follows on the next 12 pages

**ALDERHOLT NEIGHBOURHOOD PLAN:
REPRESENTATIONS ON BEHALF OF MR. & MRS. M. STEVENS**

1.0 INTRODUCTION

- 1.1 These representations in respect of the Alderholt Neighbourhood Plan (ANP) are submitted on behalf of Mr. & Mrs. M. Stevens. They own Blackwater House and have resided there since 1973. It sits on approximately 3.8 ha of land at Blackwater Grove, Alderholt. The extent of their land is shown edged red on the plan produced as **Appendix 1** to these representations.
- 1.2 Mr. & Mrs. Stevens are seeking an amendment to the settlement boundary to Alderholt so as to include their land within it. The consequence of this is that it would allow the land to come forward for residential development. This will assist in contributing to the indicative ANP housing target of 192 dwellings in the plan period 2022-2034. It is therefore considered appropriate for the land at Blackwater Grove to be allocated for housing together with accessible green space.

2.0 BACKGROUND & CONTEXT

- 2.1 Blackwater House is the oldest property in Blackwater Grove. Situated on the northern side of the road, at its western end, its construction considerably pre-dates the other houses, which were developed from the early 1970's onwards - following completion of the new foul water drainage system.
- 2.2 The Development Diagram from the Draft Alderholt Village Plan, 1971, shows Blackwater House as part of the existing settlement alongside the then planned housing and open space proposals for this part of the village. These are identified as Areas 5a, 5b and PF on the extract produced as **Appendix 2** to these representations.
- 2.3 Currently, Alderholt is identified as a fourth-tier settlement - a Rural Service Centre (RSC) - within Policy K2 of the Christchurch & East Dorset Local Plan (CEDLP) Part 1, 2014. The RSCs are identified as:

“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.”

2.4 More recently, the Dorset Council Local Plan (DCLP) Consultation Document 2021 re-classified Alderholt as a larger and more sustainable Tier 3 settlement that is considered to be an appropriate location for small-scale infilling to meet local needs. The DCLP also identified Alderholt as being within the South Eastern Dorset Functional Area.

2.5 However, unlike a number of other settlements in this functional area, it is not situated within the Green Belt (GB) and its potential geographical expansion is not constrained by GB policy. In this respect, DCLP Policy DEV2 applies:

“...In the parts of the south east Dorset functional area beyond the south east Dorset Green Belt, housing growth will be delivered:

V. through windfall and infilling within existing settlements defined by local plan or neighbourhood plan development boundaries;

VI. on the edge of towns and other main settlements, through the larger-scale allocation of land at Blandford; and the smaller scale allocation of land at Swanage;

VII. on the edge of larger villages, through the larger-scale allocation of land at Crossways / Moreton Station and Wool, and smaller-scale allocation of land at Bere Regis.”

2.6 The DCLP did not set a residential development target for Alderholt. Instead, it contained (at Paragraph 7.3.4) the following summary of development options:

“At Alderholt, which lies on the outer edge of the green belt, options are being considered for major transformatory growth. The level of growth that may be appropriate at Alderholt is not fully understood but it would need to deliver significant employment and other facilities to improve the self-containment of the settlement....”

2.7 Thereafter, Section 18 of the DCLP considers two options for growth at Alderholt:

- Option 1 - Small scale expansion on land north of Ringwood Road (Policy ALD1).
- Option 2 - Significant expansion at Alderholt.

2.8 Both options were illustrated in Figure 18.1, with the Option 2 proposal incorporating the land at Blackwater House up to its western boundary. This is reproduced in **Appendix 3**.

2.9 Whilst the ANP does not take forward the proposal to significantly expand the settlement, it is considered that the recent proposal to amend the settlement boundary and allocate the land at Blackwater House remains appropriate, for the reasons as now set out in these representations.

3.0 DETAILED REPRESENTATIONS

3.1 **Objections** are submitted to the policies of the ANP on the following bases:

- (i) The indicative housing figure has not been the subject of public consultation and is too low.
- (ii) The proposed allocated sites have issues that may adversely affect their ability to deliver open market and affordable houses.
- (iii) Additional land is required to meet the housing needs of the settlement - the land north of Blackwater Grove being suitable to accommodate this additional need.

3.2 THE INDICATIVE HOUSING TARGET

3.3 The indicative housing target of a further 50 dwellings over and above existing commitments is set out at the end of Paragraph 4.1.6. - noting that this figure is not set out in any ANP policy. There will therefore be no **policy** commitment to achieving this, or any other, housing target. This is considered to be a major oversight.

3.4 Notwithstanding the lack of an overall policy target, the 50 dwelling target set out in the supporting text has been pre-determined and established as an effective control total without being the subject of specific public consultation. Paragraph 4.1.3 refers to the quantum of housing for the settlement being set following discussions held in 2023 with Dorset Council.

3.5 Neither the ANP nor any background evidential documents record the nature of those discussions and how the target of 50 dwellings, over and above existing commitments, was established. As such, the ANP is not informed by any alternative housing strategy scenarios. Instead, a limited non-policy-based target has been set that may fail to adequately cater for future housing need, particularly the need for affordable housing.

3.6 The quantum of future housing has been established on the false premise that each of the three allocated sites will deliver a total of approximately 55 dwellings and that an affordable housing quota of 35% (also a non-policy-based target) will result in the construction of 19 affordable dwellings - against a local needs target of 18.

3.7 However, this ignores the recent evidence of affordable housing development from sites currently under construction, where viability has substantially impaired delivery. This is demonstrated in the following schedule.

SITE	ORIGINAL AFF. HOUSING NO./%	AMENDED AFF. HOUSING NO./%	REDUCTION
Former Surplus Stores, Daggons Road	27 (30%)	0 (0%)	27
Land North of Ringwood Road	22 (50%)	7 (15%)	15
Total	49 (36.8%)	7 (5.3%)	42

3.8 If it is accepted that the Surplus Stores site is regarded as exceptional in viability terms, then a quota of 15% - the Ringwood Road site - would appear to reflect the realistic delivery return, taking into account current development economics, including construction costs.

3.9 Using this methodology alone, to satisfy an affordable housing need of 18 would require a revised housing target of 120 dwellings - an increase of 70 on the existing target.

3.10 Other methods of assessing housing need may lead to different conclusions, but the ANP has not undertaken alternative evaluations. The revised figure of 120 is therefore considered to be sound in terms of offering more choice and flexibility for housing delivery, particularly for affordable housing.

3.11 PROPOSED ALLOCATED SITES

3.12 *Policy 12: East of Ringwood Road* - the site is on the southern edge of the settlement, approximately 1.2 km from the village centre facilities (convenience store, village hall and public house) at Station Road. Given the lack of pavements along part of Ringwood Road, a pre-requisite to development is the need to provide two routes for pedestrians across land owned by third parties.

3.13 The third-party sites are to the north of Ringwood Road on the land that is currently under construction for housing, and adjacent Parish Council land, the use of which will form a link to Birchwood Drive. This latter route will actually increase the walking distance to Station Road from the proposed allocated site.

- 3.14 The necessity to acquire rights across third party land may adversely impact the delivery of the site for development through the timescale required to acquire the rights, and the costs of doing so.
- 3.15 *Policy 13: South of Daggons Road* - the development of this site will extend the settlement in a linear manner to the west. It is however relatively unconstrained, although the viability of developing employment land is questionable.
- 3.16 *Policy 14: South of Blackwater Grove* - this site has a constrained vehicular access in that the southern site boundary is 35 metres away from the adopted highway. The development of the site therefore requires the acquisition of third-party land. This could delay delivery and add to the site development costs in the same manner as the site east of Ringwood Road.
- 3.17 In addition, the use of this southerly arm to Blackwater Grove for site access will adversely affect the quiet amenity of the occupiers of the eight dwellings that front on to the road. Being a cul-de-sac, the residents here benefit from a very quiet residential environment that will fundamentally change with the substantial additional vehicle movements that will be generated by the development of the site.
- 3.18 The supporting text to Policy 14, at Para. 4.3.20, refers to potential alternative access through Attwood Close. However, access for development purposes here is unlikely to be acceptable. The road is narrow with poor horizontal alignment, has inadequate forward visibility at its junction with Ringwood Road, and is also a cul-de-sac where the residents enjoy very quiet amenity.
- 3.19 INITIAL CONCLUSION
- 3.20 It is considered that there is a need to increase the housing development target of the ANP from 50 (or 55 given the maximum site capacities) to 120. Development at this level will be of a scale that remains consistent with adopted Policy KS2 of the CEDLP, and entirely appropriate for an RSC.
- 3.21 The allocation of additional land for residential development will give certainty to the delivery of an appropriate level of housing over the lifetime of the ANP, given that there are access constraints associated with the delivery of two of the allocated sites that could delay or even stop the delivery of 40 of the proposed homes.

3.22 PROPOSED NEW SITE ALLOCATION: NORTH OF BLACKWATER GROVE (BLACKWATER HOUSE AND ASSOCIATED LAND)

3.23 Blackwater House and its associated land has already been the subject of representations to Dorset Council and Alderholt Parish Council through various consultations, including the DCLP, its associated Strategic Housing Land Availability Assessment (SHLAA) and the ANP. In particular, the SHLAA site assessment concluded that land at Blackwater House was:

“A suitable site subject to policy change. Outside the development boundary however relates well to the settlement pattern and could suitably be brought forward as part of a larger scheme. Suitable site subject to policy change.”

3.24 Background evidence to inform the ANP included a Site Options and Assessment 2023 prepared on behalf of Alderholt Parish Council by AECOM Ltd. They considered whether the SHLAA conclusions were reasonable and sufficient to be carried forward to the ANP site assessment stage; of which the response was:

“Yes. The site is accessible via Blackwater Grove and would round off the settlement in this location. The site is subject to policy change (Neighbourhood Plan Allocation). The landowner has confirmed that a larger site area than considered through the 2021 SHLAA is now available (3.8 ha), including part of the railway.”

3.25 At this stage within the AECOM assessment, it was recommended to include the site within a larger settlement boundary. However, together with eight other sites the land at Blackwater House, the assessment was refined by reference to 13 criterion. From this evaluation, based on a red-orange-green traffic light matrix system - the three allocated sites were selected to be included within the ANP as development allocations, with the six others being excluded.

3.26 **It is considered that this final selection process incorrectly excluded the land at Blackwater House - and that the assessment criteria should have resulted in a positive recommendation for the site to be included as a residential development allocation.**

3.26 The reasoning for this assertion is that Blackwater House scored more highly (i.e. had most green lights) than the other sites, including the three that were ultimately selected as allocations. The site was most positive (green) for 9 of the criteria, average (orange) for 3 of the criteria, and poor (red) for only 1 criteria - this being the ability to deliver local employment - for which all sites scored the same (although the Daggons Road site has subsequently been identified to accommodate a small element of employment land).

3.27 The matrix results for Blackwater House and the three allocated sites are set out on the following page of these representations.

CRITERION	BLACKWATER HOUSE	R'WOOD RD. POLICY 12	DAGGONS RD. POLICY 13	B'WATER GR. POLICY 14
Retaining Ald's Compact Form	Green	Green	Green	Green
Distance to Village Centre	Green	Green	Green	Green
Avoiding Loss of Amenities	Green	Green	Green	Green
Potential to Improve Amenities	Green	Orange	Green	Orange
Ability to Plan for 50 dwellings	Orange	Orange	Orange	Green
Ability to Deliver 10+ Affordable	Green	Orange	Orange	Green
Ability to Deliver Employment	Red	Red	Red	Red
Access to Sustainable Transport	Orange	Orange	Orange	Orange
Improve Transport Network	Green	Orange	Green	Orange
Fund Trailway Project	Green	Orange	Green	Orange
Countryside Impact	Green	Green	Orange	Orange
Avoid Development in Hamlets	Green	Green	Green	Green
Impact on Biodiversity	Orange	Green	Green	Orange
<i>Green - Positive</i>	9	6	8	6
<i>Orange - Average</i>	3	6	4	6
<i>Red - Poor</i>	1	1	1	1

3.28 Within only two criterion does Blackwater House score lower than any other site. Of one of these, the ability to plan for 50 dwellings at the Blackwater Gove Site (Policy 14) is now no longer relevant as that site is now only planned to accommodate 20 dwellings.

3.29 In respect of the other - impact on biodiversity - it is the ability of the site to directly connect to a bridleway (which subsequently links to heathland) that is regarded as a potential disadvantage. This is a consequence of the site's proximity to the a bridleway, which instead should be considered as a positive benefit as opposed to a constraint.

3.30 In view of its high ranking, the 3.8ha of land at Blackwater House should therefore be added to the list of residential site allocations in the ANP

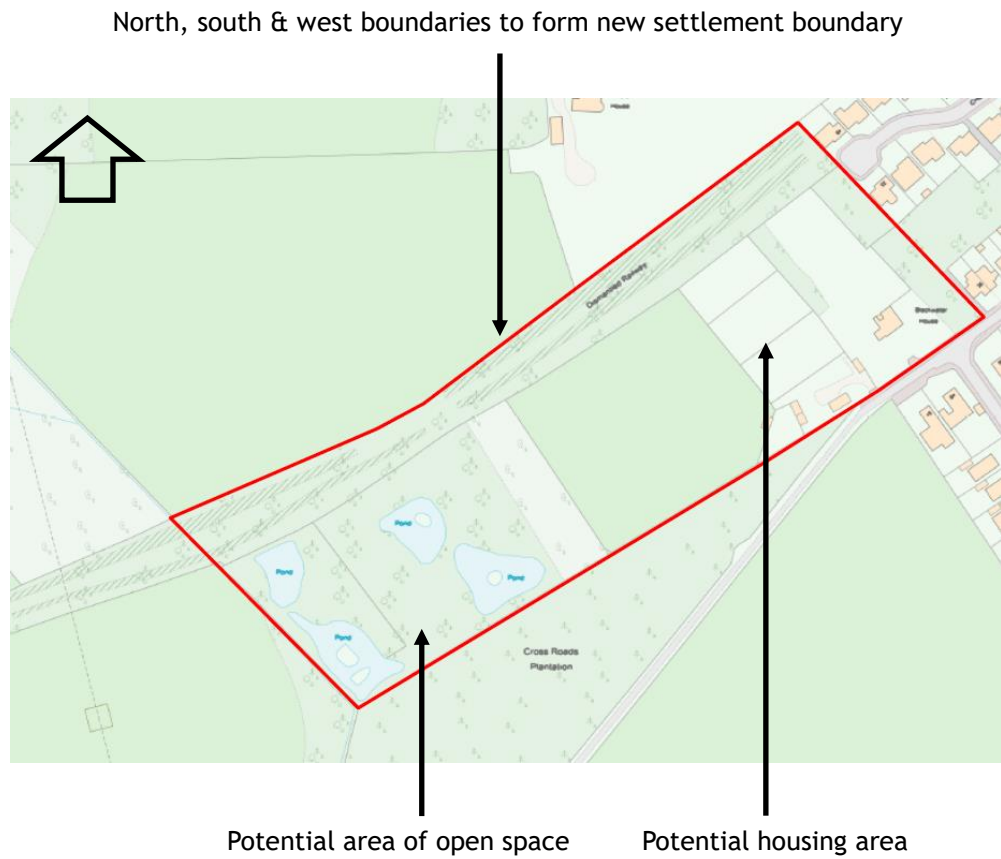
4.0 LAND AT BLACKWATER HOUSE: SITE DEVELOPMENT OPPORTUNITIES

4.1 The site boundaries are shown in the plan produced in Appendix 1. The extent of the land is consistent with that illustrated on Figure 4.1 of the AECOM Site Options and Assessment, 2023. In accordance with the review outcomes from that assessment, the site has the potential to accommodate 40 dwellings and will round off development in this part of the village.

- 4.2 The site has the significant benefit of being able to contribute towards the potential westward extension of the Alderholt Trailway, with the site accommodating a part of the former railway line that ran through the village. In addition, the treed area on the western part of the land has the potential to provide a quality recreational open space with links to nearby footpaths and bridleways, as well as the future Trailway.
- 4.3 The site also has good frontage to Blackwater Grove with potential to form a development access at the eastern end of the site. Here there is a 1.8 metre wide service strip that could easily be upgraded to a pavement, giving good pedestrian access from the site to the village centre.
- 4.4 BACKFALL POSITION
- 4.5 In accordance with our previous representations, should the settlement boundary not be extended in the manner sought in these representations, then a backfall position is proposed whereby a small adjustment is made to the settlement boundary so as to include Blackwater House within the urban area of Alderholt - reflecting the historic setting of the dwelling within the settlement as described in Paragraph 2.2 of these representations.
- 4.6 This backfall position is shown in **Appendix 4**. This would reflect the true extent of existing residential development in this part of Alderholt and allow a very small amount of infill development without compromising the eventual overall housing target for the settlement.
- 4.7 Conclusion
- 4.8 In conclusion, the land at Blackwater House has the potential to positively contribute to fulfilling the future housing needs of Alderholt through an amendment to the settlement boundaries and allocation of the land for the residential development of 40 dwellings. The recent assessment of the site by AECOM as part of the evidential base for the ANP supports this proposal - which is now commended as a modification as part of the future ANP examination and adoption process.

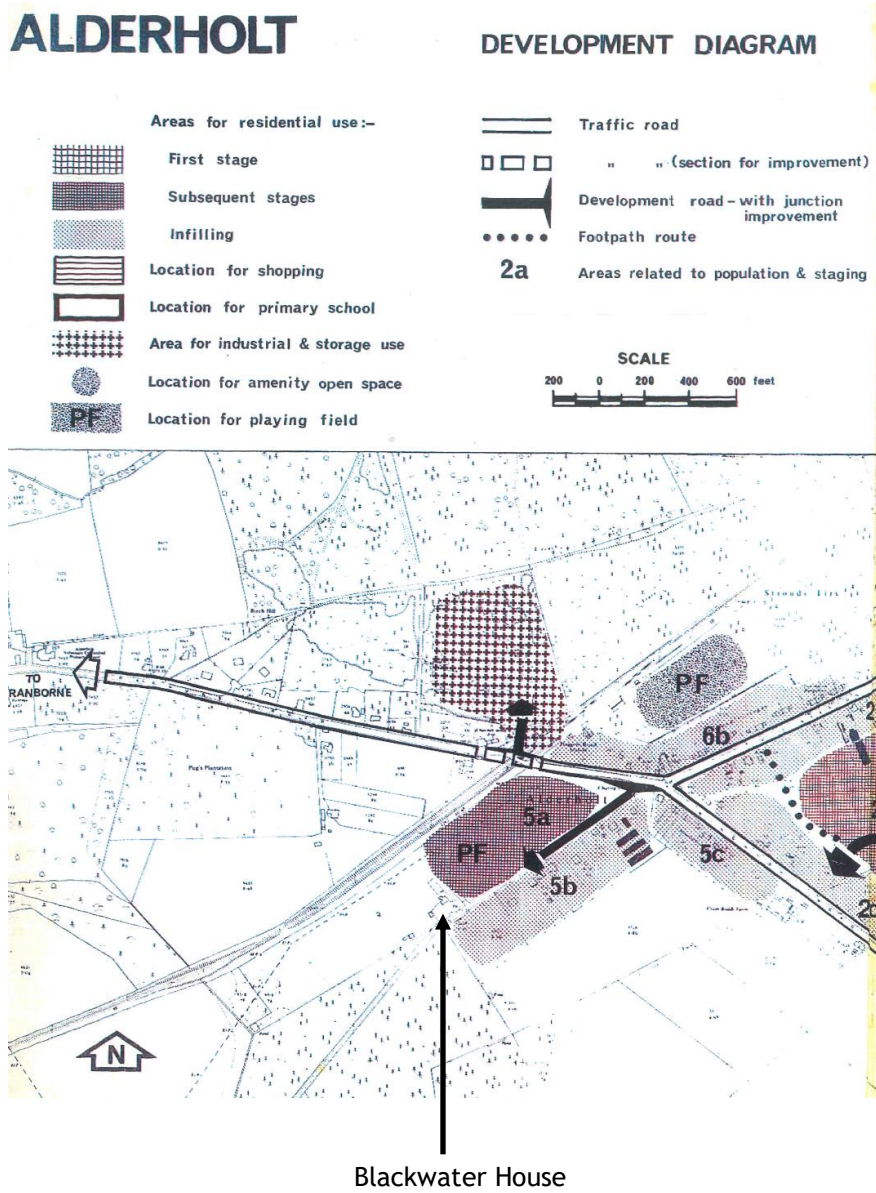
APPENDIX 1

Blackwater House; Site Boundaries



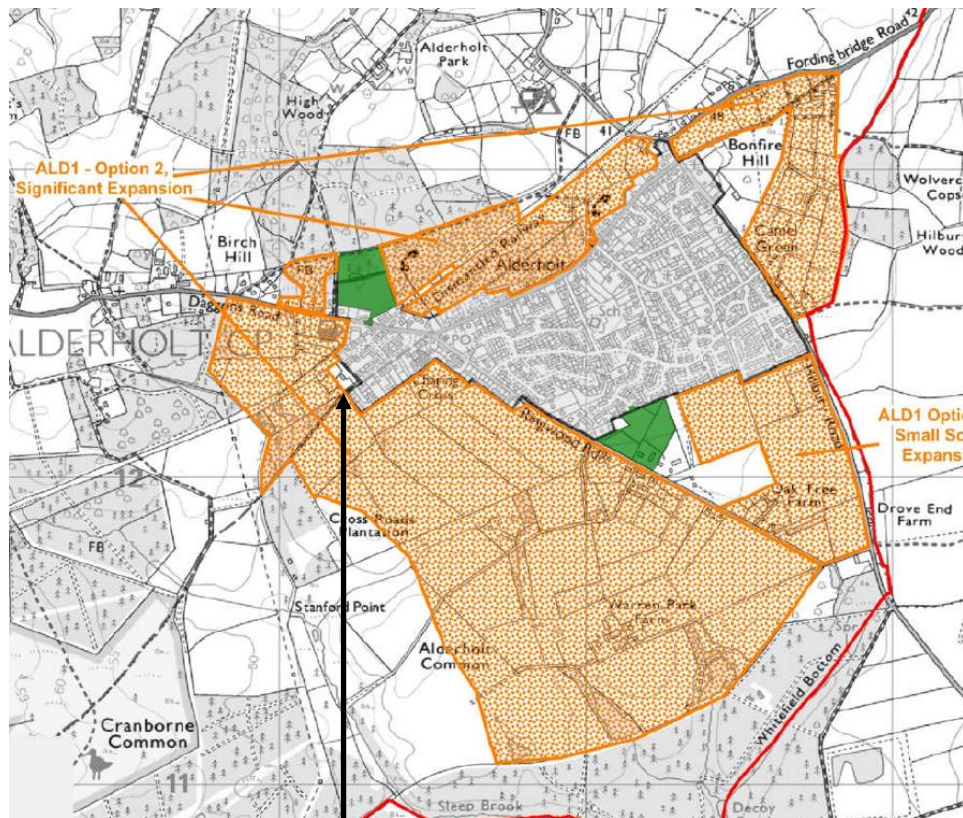
APPENDIX 2

Draft Alderholt Village Plan (Extract), 1971



APPENDIX 3

Extract from Dorset Council Local Plan, 2021

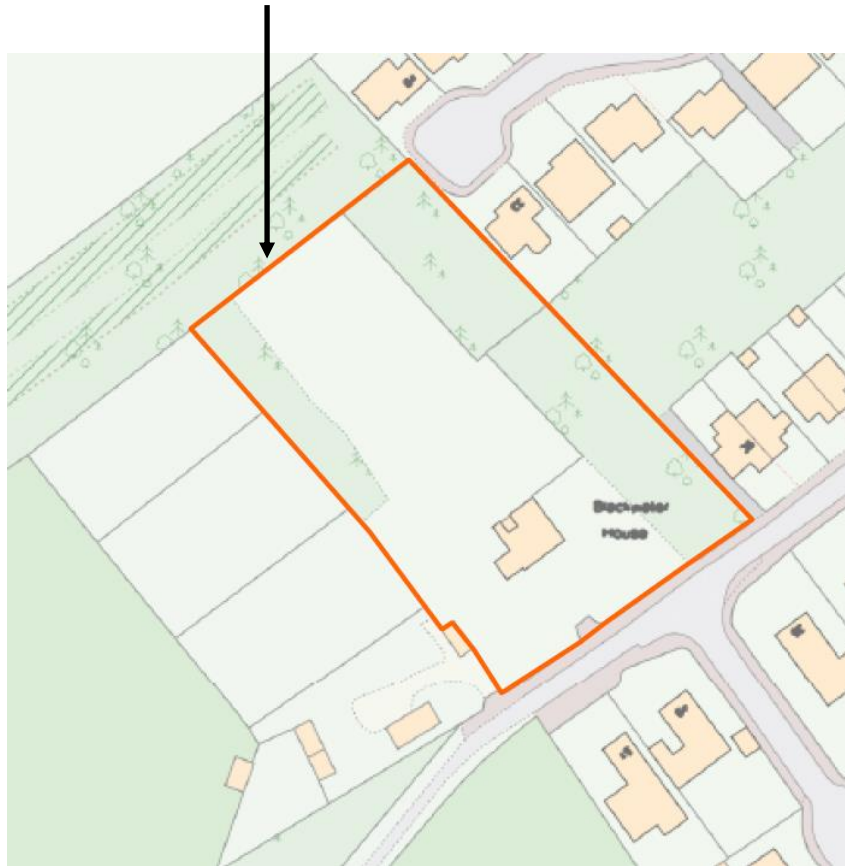


Blackwater House

APPENDIX 4

Backfall Position

North, south & west boundaries to form new settlement boundary



Representation number: 20

From: Mr Mick Huzzey, resident

Submitted: 17 June 2024

Comments:-

The plan is hoping to build on ground that is woodland or very wet not suitable as drainage is bad also it is far to small to enable any improvement to village IE shops buses schools etc and also it's along way away from the recreation ground forcing people to drive to it rather than walking not good for environment

Also the sang does not meet national requirements

Representation number: 21

From: N J Thorne, landowner

Submitted: 18 June 2024

Comments:-

N J Thorne's first two letters follow on the next 7 pages.

N J & J A THORNE



BY EMAIL & POST

The Chief Planning officer
C/o The planning policy dept / Philip Reese
Planning Services
Dorset Council
Council Offices
County Hall
Dorchester
Dorset DT1 1XJ

**planningpolicy@dorsetcouncil.gov.uk &
neighbourhoodplanning@dorsetcouncil.gov.uk**

18th June 2024

Dear Sir / Madam

**ALDERHOLT NEIGHBOURHOOD PLAN - LOCAL GREENSPACE
CONSULTATION**

Thank you for your email dated 15th May 16th, to which I would like to comment as follows:

1. I am the landowner of land known as Crossroads plantation which lies to the west of Alderholt. You have written to inform me that the parcel of land on the south side of the Bridleway is being considered for a Local Green Space designation within the emerging Alderholt Neighbourhood Plan and have requested comments by 25th June 2024. You have classified the parcel of land as Reference number LGS10.
2. You are aware that the land has recently formed part of a planning application submitted by Dudsbury Homes Ltd (planning reference P/OUT/2023/01166 Land south of Ringwood Road Alderholt) which was refused planning permission and is also being promoted through the emerging Dorset Local Plan. You will therefore be aware that as

part of the proposals LGS10 was proposed as Suitable Alternative Natural Greenspace (SANG) to help mitigate the impacts of recreational pressures on protected habitats.

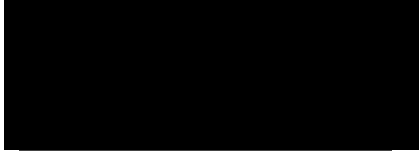
3. LGS10 has not been put forward by me or Dudson Homes Ltd as a potential Local Green Space and still very much forms part of a more strategic approach to the future growth of Alderholt being promoted and considered through the Local Plan making process.
4. The National Planning Policy Framework (NPPF) provides the context and rationale for Local Green Space at paragraphs 101-103. Paragraph 101 states that the designation of Local Green Space allows communities to *'identify and protect green areas of particular importance to them. Designating land as Local green space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.'*
5. One of the basic conditions tests for a Neighbourhood Plan is achieving sustainable development. Planning for green spaces as part of new development will often be significant in considering whether development is sustainable and planning for green spaces needs to be considered as an integral part of the wider planning for the area. Local green spaces should therefore be seen as part of a comprehensive and joined-up approach and not an ad hoc approach to designation.
6. Paragraph 102 states *'The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.'*
7. There needs to be a clear rationale and evidence for Local Green Space designation and that it is not being misused to prevent development. I have not seen or been provided with any rationale for the proposed Local Green Space designation. A low key consultation of proposed designations has taken place, but this has been no more than a token attempt to rapidly introduce policies within a Plan without a sound evidence base underpinning it. Merely asking people which green spaces they like, or support does not meet the tests set out in the NPPF.
8. The evidence base is critical to any plan making activity. The starting point is to identify and categorise green spaces, noting any designations that exist on that space, its quality and condition and the value and benefit it has to the local community. Such evidence can be from secondary data sources such as reports and studies undertaken by local authorities, QUANGOS, or groups such as the Open Spaces Society to establish the status and importance of green spaces. This should then be supplemented with evidence of value and benefits to the local community.

9. Evidence of need should also be determined. What is the existing green space provision and does it meet the needs of the existing community. Is there sufficient green space to provide for the sporting needs of the community. If the answers aren't known, then an audit should be undertaken. An approach that does not adopt such an approach and only seeks to designate sites to stop potential development is unsound and unjustified.
10. Turning to the tests in the NPPF and specifically in reference to LGS10. The site clearly meets test a. the proximity test. It also partly meets test c. being not an extensive tract of land. However, Test b, has not been justified and is not met. This test requires a piece of land to be '*demonstrably special to a local community and holds a particular significance e.g. its beauty, historic significance, recreational value, tranquillity or richness of its wildlife.*' LGS10 is regularly cut for grass and / or grazed by livestock and is utilitarian in its use.
11. The land parcel contains a clump of Scot pine Trees. The are commercially managed by Silvicultural consultant in conjunction with the Forestry Commission, in line with the additional c. 10 acres of Scots pine plantation's we own in the immediate vicinity. All of these trees are subject a valid Thinning License which details what we can /can't remove and thus protecting the Clump of Scots Pine and further 10 acres.
12. LGS010 has no public access and therefore no recreational value. It has no special beauty that make it stand out. It carries no historic significance, is less tranquil than other land that is further from the settlement and is not rich in wildlife. I am not aware of it ever having any special connection to the residents of Alderholt, given that it has been in my or my family's ownership for approximately the last 100 years.
13. The clump of trees are not natural nor historic, not have they arisen out of the area being allowed to "re-wild"; but are a hangover from when **all** of the land was a commercial conifer plantation, hence its name "Crossroads Plantation". This plantation / entire area was unfortunately destroy by means of a series of fires in c. the 1960 /70's. This has resulted in the area as its found today, however the entire area including the clump of trees are managed on a commercial basis, but have **not** arisen naturally!
14. Designating it as Local Green Space serves no planning purpose. It is not in itself a site that is under threat from development. Indeed, as part of a wider comprehensive approach to sustainable development it could serve as a valuable piece of public open space were it to come forward as part of a strategy that sought to deliver the services and facilities that Alderholt needs.

Whilst writing we also enclose a copy of our response to The Chief planning officer in relation to the TPO/2024/0043, the contents of which are self explanatory.

I therefore object most strongly to this piece of my landholding being identified as a potential Local Green Space designation having not seen or read anything that justifies your proposition.

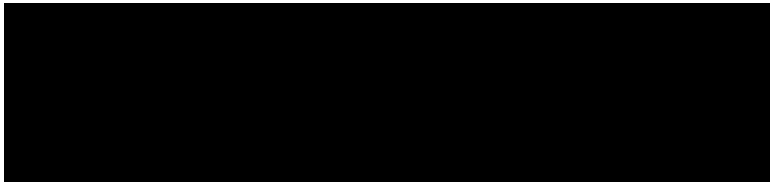
Yours faithfully,



N J Thorne BSc Hons, MRICS,
Owner and agent

Enc.

CC



N J & J A THORNE



BY EMAIL & POST

The Chief planning officer

C/o Tree Team East / Ben Turner

Planning Services

Dorset Council

County Hall

Dorchester DT1 1XJ

treeteameast@dorsetcouncil.gov.uk

18th June 2024

Dear Sir / Madam

DORSET COUNCIL TREE PRESERVATION ORDER: TPO/2024/0043- TREES LYING WITHIN LAND- NEAR BLACKWATER GROVE, ALDERHOLT KNOWN AS “CROSSROADS PLANTATION”

We are the landowners of the land known as “Crossroads Plantation” off Blackwater Grove – Alderholt and it has been drawn to our attention that the Council has issued a Tree Preservation order “TPO” reference **TPO/2024/0043** dated 3rd June 2024. In this regard we would like to make the following observations in respect of the TPO.

We would formally like to register an objection to the blanket TPO being issued in respect of the clump of trees on the agricultural land at “Crossroads Plantation”. Our reasoning for this is based on a number of factors including:

- The planning legislation is fairly clear that TPO’s are to be issued and used in order to protect trees of merit, or aesthetic or ecological value, which are deemed under immediate threat of removal.
- The land at Crossroads Plantation has been in our family for nearly the last 100 years and All of the Trees have been managed commercially over that time. The trees within the land parcel are **not** “amenity trees”. Whilst the Town and Country Planning Act does not offer an exact definition of the meaning of amenity it has been variously described as

“Pleasant circumstances or features, advantages.” (Ellis & Ruislip-Northwood UDC ([1920]) & FFF Estates v Hackney LBC ([1981])

“The pleasantness or attractiveness of a place”. (The New Oxford Dictionary of English, 1st Edition, 1998).

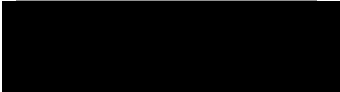
“Something, such as a swimming pool or shopping centre, this is intended to make life more pleasant or comfortable for the people in a town, hotel or other place” (The Cambridge dictionary).

- If the trees within Crossroads plantation are being defined as “amenity trees” in line with the above we would question the competence of that assessment or the person undertaking the review.
- The trees and woodland areas are managed commercially and in line with other areas of commercial softwood woodland, which we own. There is no public access or footpath to or within this area and the trees are not certainly managed on an amenity basis or in line with any of the above definitions.
- It is poor silvicultural and planning practice to issue a blanket TPO on a clump of trees / woodland areas, when there is **no** evidence to indicate that some or any of the trees which are the subject of the TPO are likely to be under threat and no justification has been provided by the LPA to justify the same.
- All of the woodland we own off the track at Crossroads plantation (near Blackwater Grove – Alderholt) is managed under a commercial arrangement. These are managed under the direction of our arboriculture consultant, and following approval of a thinning licence issued by the Forestry Commission reference 018/2429/2021 dated 23//11/2021.
- Prior to issuing the thinning licence the Forestry Commission consulted with various statutory bodies at the time. This included Natural England. Had Natural England had any concerns this would have been noted in their response back to the Forestry Commission, in line with any other consultees. In the event that the Forestry Commission had any concerns it would **not** have issued the Thinning Licence.
- The trees **are already protected** by way of the Thinning licence, which details the maximum volume, which can be removed in any one thinning. In the event that the recipient of the felling licence doesn’t comply with the thinning licence this is likely to result in an Enforcement Notice, and may constitute an offence under the Forestry Act 1967 and associated Forestry legislation.
- By issuing a blanket TPO across the whole of this clump of trees our ability to commercially manage the areas is now completely restricted; this is despite the government body – The Forestry Commission which is responsible for policy, procedures, issuing thinning and felling Licences has accepted that these trees are managed commercially in line with the other areas of timber we own and issued a commercial thinning licence. The Licence is valid and in date and runs until November 2026.
- Being unable to manage the clump of tree of due to the TPO is a serious risk to the clump itself, as if its not managed though good silvicultural practices of thinning, removing dead or dying or deceased trees, then the greater the density, and the greater the risk of damage by storms, fire, wind or purely through the ground drying out in hot weather. This in turn will impact on our commercial insurance.

- Whilst writing we also enclose a copy of our response to The Chief planning officer in relation to the consultation on Alderholt Neighbourhood Plan, the contents of which are self-explanatory. We would however like to draw your attention to part of that letter with regards to the trees themselves the entire area known as “Crossroads plantation”.
- The land parcel contains a clump of Scot pine Trees. The are commercially managed by Silvicultural consultant in conjunction with the Forestry Commission, in line with the additional c. 10 acres of Scots pine planation’s we own in the immediate vicinity. All of these trees are subject a valid Thinning License which details what we can /can’t remove and thus protecting the Clump of Scots Pine and further 10 acres.
- The area designated as LGS010 has no public access and therefore no recreational value. It has no special beauty that makes it stand out. It carries no historic significance, is less tranquil than other land that is further from the settlement and is not rich in wildlife. I am not aware of it ever having any special connection to the residents of Alderholt, given that it has been in my or my family’s ownership for approximately the last 100 years.
- The clump of trees are not natural nor historic, nor have they arisen out of the area being allowed to “re-wild”; but are a hangover from when all of the land was a commercial conifer plantation, hence its name “Crossroads Plantation”. This plantation / entire area was unfortunately destroy by means of a series of fires in c. the 1960 /70’s. This has resulted in the area as its found today, however the entire area including the clump of trees are managed on a commercial basis, but have not arisen naturally!
- **We support the use of TPO’s when trees are under threat – however these trees are not under threat. We would therefore request that the TPO is removed without any further delay.**

We look forward to hearing from you,

Yours faithfully,

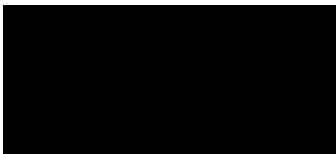


N J & J A Thorne

We would be pleased if you could acknowledge receipt by return.

Enc.

CC



Representation number: 22

From: N J Thorne, landowner

Submitted: 20 June 2024

Comments:-

N J Thorne's third letter follows on the next 7 pages.

N J & J A THORNE

BY EMAIL & POST

The Chief Planning officer
C/o The planning policy dept / Philip Reese
Planning Services
Dorset Council
Council Offices
County Hall
Dorchester
Dorset DT1 1XJ

**planningpolicy@dorsetcouncil.gov.uk &
neighbourhoodplanning@dorsetcouncil.gov.uk**

20th June 2024

Dear Sir/ Madam

**DORSET 5 YEAR HOUSING LAND SUPPLY & ALDERHOLT
NEIGHBOURHOOD PLAN CONSULTATION**

I refer to your email dated the 15th may seeking representation and comments on the Alderholt Neighbourhood plan. We have already made representations by way of our letter dated the 18th June, to Dorset Council planning authority in respect of the proposal to designate LGS10 as A Local Green Space and would request that you read both comments in their own right.

We also refer to your email request dated 6th June looking for commentary on the 5 year housing land supply.

We have on a number of occasions made representations to what was originally East Dorset and subsequently Dorset council when the local authorities have called for sites and consultations requests, in 2015, 2018, 2019 and more recently.

In this regards, please find enclosed herewith details of the land parcels we own and we have previously submitted as part of our submissions to Dorset Council, the contents of which are self-explanatory. We would be pleased if the sites as detailed below and attached are included in the Dorset Council 5 year housing land supply forecast and possible sites to be included within the Alderholt Neighbourhood plan review, allocation list, "call for sites" and for the reasons stated.

We feel it's worth highlighting that if the Parish Council (& Dorset Council) do progress a form of large scale residential development at Alderholt, as previously suggested might be the case at the time of the East Dorset Local plan consultation, by way of phasing; we would recommend that these sites are potential housing options, and being located close to the village centre, namely Pugs Field (Daggons Road) and Crossroads (adjacent to Blackwater Grove) are identified and could form the first stage of any development. With the land contained within the solar farm being available for long-term development, on expiry of the overarching agreement. The sites we would like considered are as detailed below and attached being:

A - Land at "PUGS" - off Daggons Road; Alderholt. SP6 3DL;

B- Land at "CROSSROADS" - Blackwater Grove, Alderholt, SP6 3AD;

The two parcels of land at Alderholt (letters A & B above), were included within the East Dorset Local Plan Review – Options consultation document, for possible inclusion within the local plan, and there should be **no** reason why they should now be excluded from the Neighbourhood Plan or Dorset 5 year housing land supply allocation. We would also like to add a few further observations why these areas should be included within the settlement boundary:

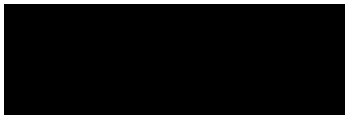
1. Both parcels of land abut the village envelope, and their inclusion as development sites would not have a detrimental affect on Alderholt and would in fact strengthen the village, by boosting the availability of potential residential & amenity sites in the village;
2. All of the land is of a low quality in terms of its agricultural use, and classification (sandy by nature). If developed they would not have a detrimental affect on the agricultural economy of the area by taking fertile or productive land out of production;
3. The parcels of land are greater than 400m from any SSSI, therefore whilst the number of people in the village would increase, the impact on the SSSI should be minimal, given the distances of the developments areas, away from the SSSI.
4. Up to c. 10 acres of woodland are located adjacent to the development sites as edged blue on the Attached plan. This could be brought forward as SANGs land, for the benefit of the occupants of the new housing and create additional passive recreational areas, should it be required, as identified by the LPA planning document;
5. Either development site could be developed in isolation and is not dependent on the other;
6. Either site does have the potential to be combined with the adjacent land parcels to bring forward a slightly larger and sustainable / standalone development scheme, providing residential development, SANG, and direct access to the remainder of the village;

7. We would also be willing to work with the Parish Council (& Local authority) to come up with a suitable development strategy, which uses part or all the development sites to develop suitable and acceptable schemes;
8. Additional residential development within one or more of the areas would not have a detrimental affect on local utility services.
9. The development sites both abut the public highway and the development of either site, would not increase local traffic by any great volume in comparison to other considered sites, nor do they pose a hazard to anyone using the public highways;
10. Additional housing would indirectly boost the number of people using the village school, shops, other local amenities and increase the number of pupils attending the village school which would make it more sustainable;
11. Either land parcel currently abuts existing residential properties, and their development, would not create an isolated parcel of housing development, away from the existing village boundary, but would allow the village to be expanded sympathetically without having a detrimental affect on the surroundings area or SSSI;
12. There are already public services and local utility's infrastructure close by in the public highway, and these areas could be connected in to these with minimum disruption and cost;
13. Both land parcels ("PUGS" & "CROSSROADS" with the SANG areas 1/2) are under separate "Option agreements" with local reputable developers, who would be able to physically realize the development at an early stage and bring new and affordable properties to the market, as soon as planning permission is granted, and there are no issues with contamination on either of them (unlike other sites in the village which have a valid planning permission and been slow in being developed.
14. The development would assist the local authority in meeting its housing allocation, where there is currently a significant shortfall across the region;

In summary the above sites are deliverable in terms of development, and have good access from a highways perspective, obviously if there were any concerns we would be willing to work with the relevant agencies to resolve these. We believe, these sites would contribute to the local economy should any or all or part of them be brought forward for development, and would assist the Parish Council / Local Authority by contributing to the local authorities housing allocation and requirements.

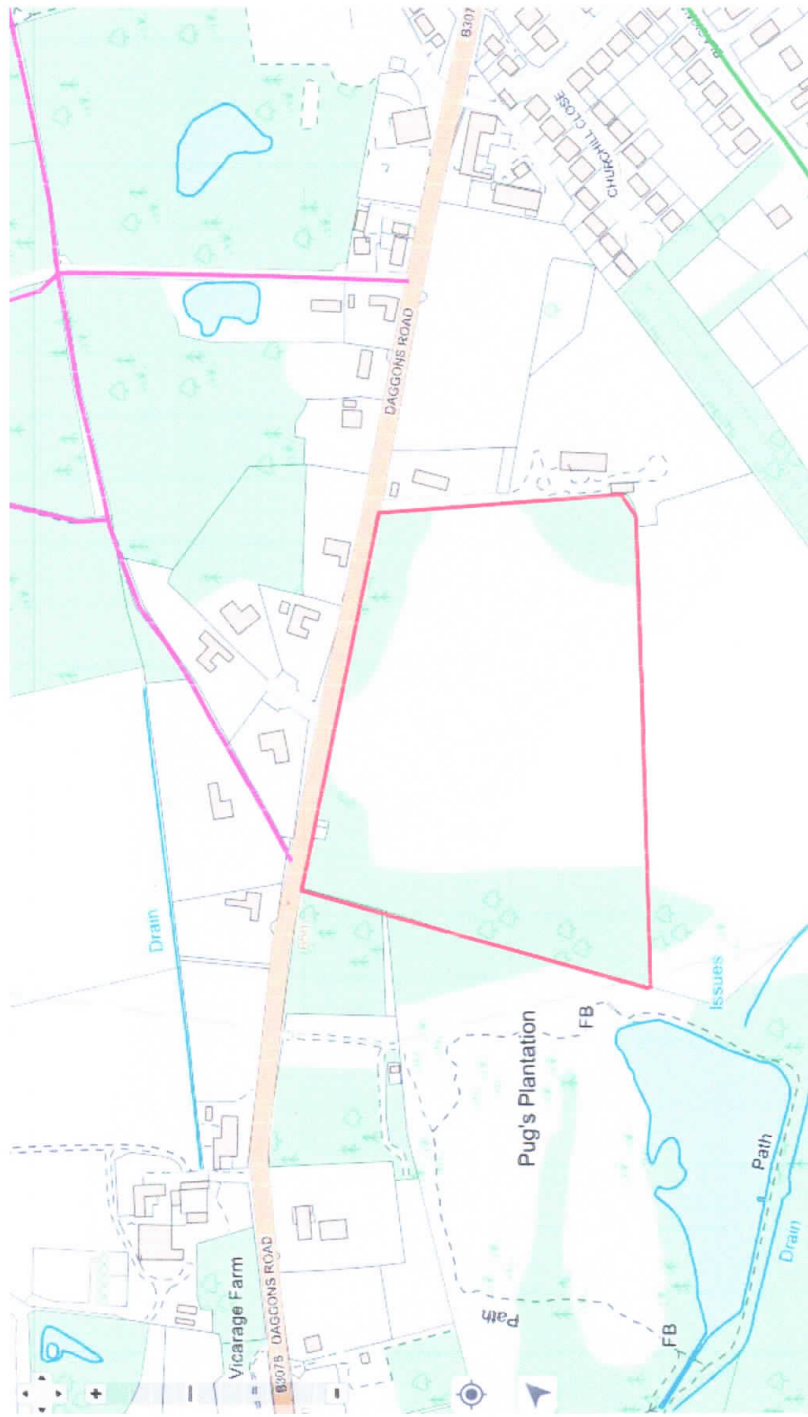
We hope the enclosed and above can be taken in to consideration, however should you require any additional information - please do not hesitate to contact us.

Yours faithfully,



N J Thorne BSc Hons, MRICS,
Owner and agent

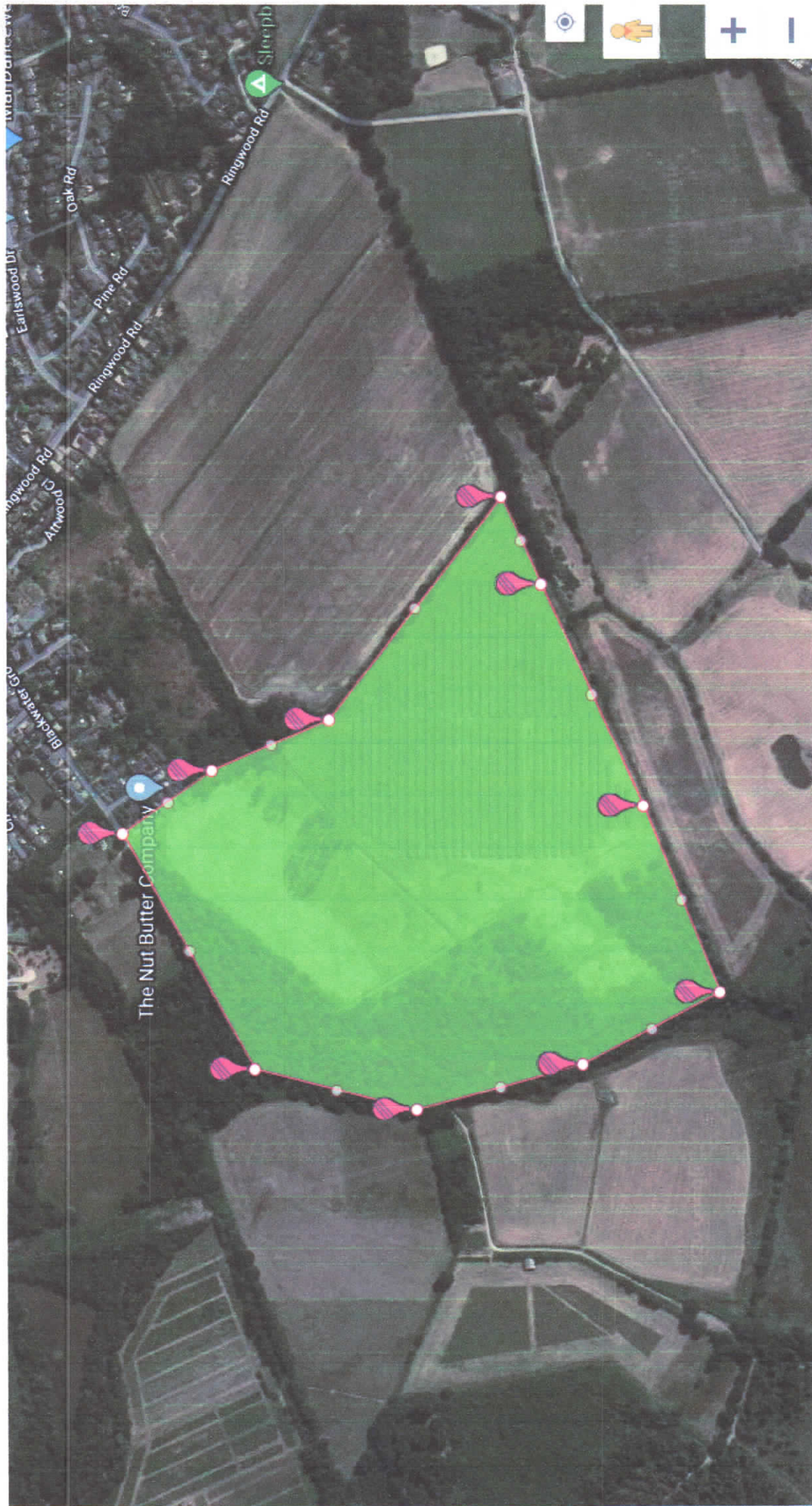
LAND AT PUGS - DAGGONS ROAD- ALDERHOLT SP6 3DL





LAND AT CROSSROADS - BLACKWATER GROVE - ALDERHOLT - SP6 3AD





Representation number: 23

From: Mrs Vivien Huzzey, resident

Submitted: 21 June 2024

Comments:-

I am in favour of the Dudsbury plan as Alderholt does not have any services and I cannot see this happening with the suggestions Alderholt parish council have proposed. The smaller developments do not provide the sang as seen in the Penny Farthing site where the sang is too far away. The proposal of a high street along station road is unrealistic and if people ever use these shops it will be by car. Without more people in the village I cannot see the Doctors wanting a surgery here. I think the school is under subscribed and it would be awful to loose our village school.

Representation number: 24

From: Mrs Jayne Barnaby, resident

Submitted: 21 June 2024

Comments:-

I am in favour of the plan that Dudsbury has submitted as I can see it will make a much better village. We need the housing as I have 2 sons and I cannot see them being able to stay in the village which they want to do. The plan has included some units and it will give people an opportunity to work in the village. The Alderholt council have put a plan for their view of the village and they have only rushed this through to try to stop the development. We need more houses so why not Alderholt.

Representation number: 25

From: Mrs Jane Marlow, resident

Submitted: 23 June 2024

Comments:-

My comments have been drawn up viewing the overall plan and do not necessarily fall under any specific point.

Future Housing Developments Areas - Policy 7

The plan does not allow for the country wide housing shortage or address that of rentable Housing Assn accommodation or affordable housing. By limiting to 50 additional homes (in addition to those already in process at the Surplus Stores and the Hawthorns sites), over 10 years equates to 5 additional homes each year, which clearly doesn't cover the shortage. This will only make the village even more stagnant and dormant and will not encourage young people to live here. Alderholt isn't exclusively for those who currently live here. New homes would be energy efficient for the future generations and bring SANG, giving more accessible open spaces to all.

Policy 10 – Employment

There is a lack of employment within the village. Years ago it was a farming community which has long declined. By allowing the construction of new homes, employment would be available for tradesmen, (ground workers, bricklayers, scaffolders, plumbers, carpenters etc). Once homes are built home interiors come to the fore and when homes are occupied money is spent with local hairdressers, beauticians, window cleaners etc, all of which helps the economy thrive, plus new homes contribute to council tax.

Green Space and Landscaping Policy 6 and 16

There is reference to areas of recreation. A considerable number of open spaces are overgrown and not suitable for walking on, due to the lack of management. The Alderholt Recreation and Play Area needs urgent drainage work, as during the months of October to April it is impossible to walk on for fear of slipping or for children to safely play in the play area due to the flooded conditions.

New homes bring, new trees and planting, which encourages birds and wildlife into the new habitat. Landscaping forms part of the planning permission.

CIL monies from new homes would bring money to the community to drain the recreation ground, improve the play areas, develop the idea of a Trailway, improve footpaths around the village, in particular the footpath to the rear of the Reading Rooms.

Alderholt Nurseries 002

20 homes on this site seems excessive and high density for the area. Also, it is noted that a footpath would be established allowing for access to Parish Council land (Recreation Ground), something which was not granted for the Hawthorns site. Also why put this site into the plan when it was previously objected too?

Transport Impacts

Better communication between Dorset CC and Hampshire CC to make improvements to the Somerly road would be highly beneficial to everyone travelling to and from Ringwood. Improvements to this

road would discourage road users using the narrow Kent Lane. There are other practical ways of alleviating traffic issues by installing pinch points, traffic lights, one-way system or traffic calming around the village. Reducing speed limits would be beneficial also.

Encouragement of car-sharing. CIL money to upgrade public transport.

Encouraging residents to use the local primary school would alleviate travel to and from Fordingbridge. By limiting the number of new homes within the village, this may impact on the school remaining open.

The plan allows very little in the way of encouraging the younger generation to buy their first home in Alderholt or provide amenities for children or young people. Why shouldn't others have the opportunity to share and enjoy the village life or the amazing countryside around here.

Representation number: 26

From: Robert Lofthouse, Planning Manager

Organisation: Penny Farthing Homes

Submitted: 25 June 2024

Comments:-

Pennyfarthing Homes are currently developing 45 homes in Alderholt at our development 'Oakwood Grove', on Ringwood Road. That scheme has its origins in an appeal decision in 2017 that approved outline planning permission. Development finally commenced in late 2023, four years after reserved matters were submitted.

The reasons for the protracted delay in delivery are of some relevance to the NP and the issues that this is having to address and explore. The representations are aimed at assisting an examination in ensuring soundness of any final plan.

Our comments are particularly directed to the issue of the provision of Suitable Alternative Natural Greenspace (SANG), where Pennyfarthing Homes has an ongoing interest in the site at 'Highwood'. We also provide comment on Site 002 (being adjacent to Oakwood Grove) and on housing delivery issues in general from our own practical, local and recent experience.

Highwood SANG

In accordance with the Habitats Regulations Assessment accompanying the Neighbourhood Plan, there is recognition that Pennyfarthing Homes delivered a Suitable Alternative Natural Greenspace (SANG) at Highwood. This was necessary in order to provide mitigation for the potential (cumulative) effects of new residents from our Oakwood Grove development on the protected Dorset Heaths and in the absence of their being any other local mitigation projects. Para 4.2.12 of the NP notes that *"...this should provide spare capacity for a further 38 homes"*.

It is important to note that the 38 home figures was agreed as a minimum and that Highwood SANG is potentially capable of serving more.

Whilst that additional capacity has been agreed in principle by Natural England, in the course of obtaining planning permission for the SANG, Dorset Council explicitly discouraged and refused to enter into any positive obligations that would enable Pennyfarthing Homes to actively assign any such credits to third parties.

There is currently no mechanism and there is currently no incentive for Pennyfarthing Homes to assign any such credits on a piecemeal (plot by plot) basis to third parties. Having engaged with other prospective developers, the Highwood SANG could facilitate further development in Alderholt. There remains a need for additional residential development in the area to provide appropriate mitigation in accordance with the Dorset Heathlands SPD. Highwood SANG provides a potential means to deliver that mitigation.

Affordable Housing

Policy 7 states that provision of affordable housing will be 'guided by requirements set out in the local plan'. It goes on to note that 25% of any such should be First Homes and an overall split aiming for 50:50 affordable home ownership and affordable rent. There is no justification provided for that 50:50 tenure split which does not reflect extant Local Plan policy. However, there is recognition that

alternative tenure split may be permitted “if justified by local circumstance, local needs or local viability considerations”. Such flexibility is essential from our own local experience and is welcomed.

In the case of Oakwood Grove (to update Para A1.25) as noted in footnotes, reserved matters details were approved in 2023 four years after submission. The original provision of 50% affordable was reduced by Agreement with Dorset Council to 15% on the basis of scheme viability. That included not only the need to deliver SANG, but also Phosphate mitigation and more general financial viability including build cost issues (all agreed by the District Valuer and accepted by the Council). Agreement was latterly secured for these seven affordable homes to all be First Homes (affordable home ownership) in the absence of any Registered Provider, following a period of marketing, being willing to offer to manage and maintain any affordable homes (of any form or tenure) at our development.

Policy 12 Alderholt Nursery

This site abuts the Oakwood Grove development. Para 4.3.5 and Policy 12 itself notes that pedestrian access from the Nursery site should be achieved both within the site “...and with the adjoining development to the north (which links though to Broomfield Drive), if feasible”.

The supporting text notes that there is also the opportunity to connect through the Parish Council recreation ground (subject to the agreement) and that both links would be desirable but “...in the case of the latter would be dependent on negotiations with a third party”.

In fact, both links would involve negotiations between an Applicant and a third party (the Parish Council or Pennyfarthing Homes).

The Parish Council had refused to allow an access from Oakwood Grove to the recreation ground.

For the record, there is no agreement in place between Pennyfarthing Homes and with the adjacent landowner for any rights across the site boundary and through the Oakwood Grove development. The approved Oakwood Grove development makes no express provision for any future connection or route. However, we would be happy, in principle, to provide such an access, by negotiation.

I wish to be notified of Dorset Council’s decision on the NP at R19 Stage. We are willing to offer to make further representations as may be necessary to aid the Examination of the NP, in relation to these comments and other issues that may be raised as part of that process.

Representation number: 27

From: Mr Nicholas Moore, resident

Submitted: 25 June 2024

Comments:-

The Plan identifies only offers piecemeal additions to the housing in Alderholt and is not of the scale required to enable additional infrastructure and facilities to be built meaning that residents will still have to travel to access these services and the status quo will remain. The SANG proposed on Blackwater Grove will increase pressure on the Dorset Heathlands RAMSAR with additional pedestrian access.

Representation number: 28

From: Caroline Gould, Associate Director

Organisation: Nova Planning, on behalf of Macra Limited

Submitted: 25 June 2024

Comments:-

Please see written representations and associated supporting documentation attached in one PDF file.

The representation on behalf of Macra Limited follows on the next 11 pages.

1. Introduction

- 1.1 These written representations have been prepared by Nova Planning Limited on behalf of Macra Limited ('Macra') in response to the Alderholt Neighbourhood Plan 2022-2034 Submission Version for Regulation 16 Consultation ('draft Neighbourhood Plan') dated April 2024. These written representations relate to this publication of the draft Neighbourhood Plan and its supporting evidence base.
- 1.2 Macra is promoting land to the south of Daggons Road in Alderholt ('the Site'), which has previously been promoted through the earlier stages of the Neighbourhood Plan process. This has subsequently led to the Site being identified as a draft allocation, known as 'Site 006a: Paddock South of Daggons Road', for "about 15 dwellings and at least 0.2ha of employment land (falling within Use Class E or similar)", under Draft Policy 13 of the emerging Neighbourhood Plan.
- 1.3 The Site is located at the western end of the settlement of Alderholt, on the southern side of Daggons Road. It is broadly rectangular in shape and extends to approximately 1ha in area, located immediately to the west of Alderholt Motors. It rises gently to the west and comprises a paddock which has most recently been used for horse grazing. There is an existing field gate access to the Site located centrally along the Daggons Road frontage. The Site's boundaries comprise existing trees and hedgerows.
- 1.4 In promoting the Site for future development, Macra has commissioned a Testing Layout for a proposed mixed-use residential and commercial development. An extract of the draft proposal is included in Figure 1 below and further details of the form and quantum of development considered deliverable on the Site are set out later in these written representations:



Figure 1 – Extract of Testing Layout for the Site

- 1.5 The written representations below provide comments on the details of the draft allocation of the Site, as well as comments in relation to other relevant draft Neighbourhood Plan policies.

- 1.6 These written representations are supported by separate technical evidence including a Proposed Site Access and Visibility Splays Plan (Drawing No. 1430-001 prepared by CDA); Proposed Site Access Swept Path Analysis Plan (Drawing No. 1430-002 prepared by CDA); Tree Constraints Plan (prepared by Barrell Tree Consultancy Reference Number 20146-1 A); and Flood Risk Note (prepared by CDA dated January 2024). These documents should be read in conjunction with these written representations and confirm the suitability of the Site to deliver the type and level of development proposed by Macra.

2. Neighbourhood Plan Period and Housing Need

Neighbourhood Plan Period

- 2.1 Macra supports the ambition of Alderholt Parish Council to prepare a Neighbourhood Plan for the settlement to guide future development and agrees with the Neighbourhood Plan progressing ahead of the emerging Dorset Local Plan which is currently not expected to be adopted until 2027.
- 2.2 Macra also supports the Parish Council's recognition at Paragraph 1.2.13 of the draft Neighbourhood Plan that, because the Neighbourhood Plan is progressing ahead of the emerging Dorset Local Plan, it will be necessary to review the Neighbourhood Plan well before its proposed 2034 end-date, and most likely within five years of the Neighbourhood Plan being 'made'. This will ensure that the Neighbourhood Plan is in general conformity with the strategic policies contained in the Dorset Local Plan (once adopted) and therefore that it is consistent with national policy including Paragraph 29 (Footnote 19) of the NPPF. The Parish Council's suggestion of an early review of the Neighbourhood Plan will allow for consideration of both the Local Plan housing target for Alderholt (which will not be confirmed until the expected date of adoption of the emerging Dorset Local Plan, i.e. currently 2027) and whether any further allocations in the Neighbourhood Plan may be necessary. Macra supports this approach.

Housing Need

- 2.3 Section 4.1 of the draft Neighbourhood Plan sets out an indicative housing target for Alderholt of 192 dwellings (16 dwellings per annum (dpa)). This is at the upper end of the identified appropriate housing target of 4 to 16 dpa, resulting from discussions between Dorset Council and the Parish Council in early 2023.
- 2.4 Further to the above, the draft Neighbourhood Plan deducts the extant housing supply from the total of 192 dwellings, comprising 89 dwellings permitted on the former Surplus Stores site on Daggons Road and 44 dwellings on the former Hawthorn Nurseries site on Ringwood Road. The draft Neighbourhood Plan states that this leaves a remaining indicative housing target of 50 dwellings to be identified (albeit 192 dwellings – 89 dwelling – 44 dwellings = 59 dwellings remaining). The draft Neighbourhood Plan identifies three draft housing allocations to meet this remaining indicative housing target, as follows:
- Draft Policy 12: Alderholt Nursery, East of Ringwood Road (Site 002) = about 20 dwellings.
 - Draft Policy 13: Paddock South of Daggons Road (Site 006a) = about 15 dwellings (**Site controlled by Macra**).
 - Draft Policy 14: Land South of Blackwater Grove (Site 009) = about 15-20 dwellings.
- Total draft housing allocations = about 50-55 dwellings.
- 2.5 In response to the three draft housing allocations, Macra wishes to make two points. Firstly, evidence has previously been submitted, and is provided again in support of these current written representations (see Section 3.0 below), to confirm that the Site has capacity to accommodate up to 20 dwellings (together with the proposed employment land also identified as part of the draft allocation). It is therefore considered that the wording of Draft Policy 13 of the Neighbourhood Plan (which relates to Macra's Site) should be consistent with the wording of Draft Policy 14 relating to Land South of Blackwater Grove, which provides a range of 15-20 dwellings for this allocation. As well as ensuring consistency between the allocations, this amendment will allow flexibility in how the indicative housing target for Alderholt is achieved, as well as more accurately reflecting the actual indicative housing target of 59 dwellings (not 50 dwellings). If the quantum of development identified for the Site is amended in Draft Policy 13 to

“about 15-20 dwellings”, the actual indicative housing target for Alderholt of 59 dwellings can be met as follows:

- Draft Policy 12: Alderholt Nursery, East of Ringwood Road (Site 002) = about 20 dwellings.
 - Draft Policy 13: Paddock South of Daggons Road (Site 006a) = about 15-20 dwellings (**Site controlled by Macra**).
 - Draft Policy 14: Land South of Blackwater Grove (Site 009) = about 15-20 dwellings.
- Total draft housing allocations = about 50-60 dwellings.

2.6 In addition to the above, the Government’s PPG provides advice at Paragraph 009 (Reference ID 41-009-20190509; Revision Date 09.05.2019) in relation to Neighbourhood Plans coming forward before an up-to-date Local Plan or Spatial Development Strategy is in place (as will be the case with the Alderholt Neighbourhood Plan ahead of the emerging Dorset Local Plan) and states the following:

“Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its local plan (or, where applicable, a spatial development strategy is being prepared by an elected Mayor or combined authority).

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.

Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- *the emerging neighbourhood plan*
- *the emerging local plan (or spatial development strategy)*
- *the adopted development plan*

with appropriate regard to national policy and guidance.

The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.”

2.7 The above Planning Practice Guidance advice provides further justification in support of the draft Neighbourhood Plan identifying sufficient site allocations to meet the upper end of its indicative housing target as a minimum (i.e. the “about 50-60 dwellings” suggested by Macra in Paragraph 2.5 above), including amending Draft Policy 13 to identify the Site for “about 15-20 dwellings”. Section 3.0 below provides confirmation that the Site can accommodate the suggested increased range of 15-20 dwellings.

- 2.8 This approach will ensure that the draft Neighbourhood Plan sets out a housing land supply policy which reflects the current housing target for Alderholt provided by the Local Authority, therefore minimising any conflicts between policies in the Neighbourhood Plan and those in the emerging Local Plan and contributing to the achievement of sustainable development, all of which is consistent with the above advice set out in the Government's PPG.
- 2.9 Identifying a sufficient supply to meet the actual indicative housing target of 59 dwellings stated in the draft Neighbourhood Plan will ensure that it is not starting on a surpressed basis, which will be especially important if there is a future need to extend the Neighbourhood Plan period to reflect the emerging Local Plan (see Paragraph 2.2 above) and consequently meet an increased housing requirement to reflect this.

3. Draft Policy 13: Paddock South of Daggons Road

- 3.1 Draft Policy 13 relates to the land controlled by Macra and allocates the Site for the development of “about 15 dwellings and at least 0.2ha of employment land (falling within Use Class E or similar)”.
- 3.2 For the reasons set out in Section 2.0 above, it is suggested that the wording of Draft Policy 13 should be amended to instead refer to “about 15-20 dwellings...”
- 3.3 An extract of Macra’s Testing Layout for the Site is provided at Figure 1 above, and shows an indicative development of 20 dwellings (including a mix of 1 and 2-bedroom flats and 3 and 4-bedroom houses), together with employment land. A full copy of this Testing Layout (Drawing No. P23-1004_DE_003_A_01 prepared by Pegasus Group) is also submitted as part of these written representations.
- 3.4 The Testing Layout has been informed by initial technical work for the Site, copies of which are submitted with these written representations, including:
- Proposed Site Access and Visibility Splays Plan (Drawing No. 1430-001 prepared by CDA);
 - Proposed Site Access Swept Path Analysis Plan (Drawing No. 1430-002 prepared by CDA);
 - Flood Risk Note (prepared by CDA dated January 2024); and
 - A Tree Constraints Plan (prepared by Barrell Tree Consultancy Reference Number 20146-1 A).

Vehicular Access

- 3.5 The Proposed Site Access and Visibility Splays Plan (Drawing No. 1430-001 prepared by CDA) submitted with these written representations has been discussed with Dorset Council (as the Local Highway Authority) as part of a Highways pre-application enquiry in 2021. The drawing confirms that the proposed Site access will comprise a simple priority T-junction from Daggons Road (consistent with Draft Policy 13), with a 6.0m radii leading into a 5.0-metre-wide internal road built to adoptable standards. The proposed visibility splays of 2.4m x 59m are designed for a 37mph speed on Daggons Road (informed by traffic speed surveys).
- 3.6 The Proposed Site Access Swept Path Analysis Plan (Drawing No. 1430-002 prepared by CDA) submitted with these written representations confirms that the proposed access arrangement for the Site is appropriate for refuse vehicles and sufficient space is available within the Site to allow a refuse vehicle to turn and exit in a forward gear. This also demonstrates that the Site is also suitable to accommodate large vehicles associated with an employment use.
- 3.7 The submitted access drawings confirm that the proposed development can provide a continuous footway with acceptable widths, connecting from the proposed Site access to the existing footway to the east on the south side of Daggons Road and providing pedestrian access into Alderholt. This is consistent with the provisions of Draft Policy 13.
- 3.8 The Testing Layout includes a potential pedestrian link to the northern boundary of the Site opposite Footpath E34/41 on the northern side of Daggons Road. The Testing Layout also include a proposed pedestrian footpath to the south-east boundary of the Site, to create the option for a future link towards the disused railway line to the south. Both potential pedestrian links accord with the provisions of Draft Policy 13.
- 3.9 The submitted access drawings and Testing Layout therefore confirm that the Site can accommodate the proposed development of 15-20 dwellings together with at least 0.2ha of employment land.

Trees

- 3.10 The supporting Tree Constraints Plan confirms the location and categorisation of the existing trees on the Site which are primarily located around its boundaries, together with the associated development constraints in relation to their root protection areas (RPAs) and canopies. Together, this information confirms the developable area of the Site.
- 3.11 The proposed Testing Layout for the Site has been designed to incorporate the details of the Tree Constraints Plan, with all Category A and B trees retained and all built form located outside of their RPAs / canopies. The Testing Layout requires the removal of only 1no. Category C tree which is acceptable. This is consistent with the provisions of Draft Policy 13 which refers to mature trees and hedgerows along the site boundaries being retained “as far as practicable”.
- 3.12 The Tree Constraints Plan and Testing Layout confirm that the Site can accommodate the proposed development of 15-20 dwellings together with at least 0.2ha of employment land.

Location of Employment Land

- 3.13 The wording of Draft Policy 13 suggests that the employment land to be provided on the Site should be located on the Daggons Road frontage (in line with Draft Policy 8 which is discussed in more detail in Section 4.0 of these written representations below). Draft Policy 13 also refers to the employment land on the Site including the area adjoining garage site, therefore implying that the employment land should be located on the eastern side of the Site. Draft Policy 13 also highlights that where the proposed development adjoins Daggons Road, the design, mix and layout should recognise the importance of this frontage as an entrance to the village and therefore critical to establishing its character.
- 3.14 The latter requirement of Draft Policy 13 referred to above is arguably at odds with the others, in terms of the aspiration for any development of the Site to preserve the importance of the entrance to the village and its character whilst also locating the proposed employment land along this frontage. Instead, the proposed Testing Layout represents an appropriate design response for the Site. It locates the employment land in the eastern part of the Site, incorporating the eastern end of the frontage with Daggons Road and located adjacent to the garage site to the east (as suggested by Draft Policy 13). This design approach ensures the proposed employment use on the Site has a frontage with Daggons Road and is located adjacent to the proposed Site access, but at the same time preserves the existing verdant character of the remainder of the Daggons Road frontage and its contribution to the entrance to the village from the west by providing dwellings fronting the street but set behind the existing retained trees, green space and footpaths. This design approach is also consistent with Draft Policy 6 of the emerging Neighbourhood Plan which states that “*development on the edge of the settlement should provide a soft, landscaped transition between the built-up area and countryside.*” The proposed allocation of the Site for development in the emerging Neighbourhood Plan and associated proposed extension of the settlement boundary to incorporate the Site (as shown on Draft Map 10) will result in it forming part of the western extent of the village, with countryside beyond the immediately adjoining dwelling to the west.
- 3.15 The wording of Draft Policy 13 should therefore be amended to allow for some flexibility in the location of the employment land on the Site, to better reflect the remaining wording of the draft policy as summarised above. Rather than stating “*the location of employment areas should be on the road frontage ...*” (arguably implying that the employment land should be located in the northern part of the site stretching along the Daggons Road frontage), Draft Policy 13 should be amended to state “*the location of the employment areas should be in the eastern part of the site adjacent to the adjoining garage site and including the eastern end of the Daggons Road frontage...*” This will allow for the creation of a cluster of employment uses also including The Churchill Arms public house on the opposite site of Daggons Road.

Other Matters

- 3.16 As required by Draft Policy 13, comprehensive information will be submitted in support of the proposed development of the Site including a Flood Risk Assessment, Drainage Strategy, landscaping and biodiversity details.
- 3.17 At this stage, a Flood Risk Note has been prepared by CDA (dated January 2024) and is submitted in support of these written representations. The Flood Risk Note confirms that the Site is in Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources. The Site is underlain by Parkstone Sand Formation such that infiltration is not suitable. It is expected that a surface water drainage strategy utilising positive discharge from the Site will result in betterment in terms of flood risk both on and off the site. Foul flows will be discharged via gravity sewer and connected into an existing chamber in Daggons Road. The proposed development is classified as 'More Vulnerable' in flood risk terms according to Annex 3 of the NPPF. In accordance with Table 2 of the NPPG, the proposed development for 15-20 dwellings plus commercial development is suitable in this location.
- 3.18 Any future planning application for the Site will also need to address Dorset Council's Local Validation Requirements in relation to any other applicable technical and policy matters which have been raised by third parties during the consultation stages of the emerging Neighbourhood Plan.

4. Comments on other Draft Policies

Draft Policy 7: Meeting Local Needs – Housing

- 4.1 Draft Policy 7 states that the overall provision of affordable housing will be guided by the requirements set out in the Local Plan. Macra is supportive of this approach and is committed to providing affordable housing as part of any future development of the Site, including a mix of tenures and sizes to be agreed with Dorset Council to address the identified need at the appropriate time. Paragraph 4.1.5 of the draft Neighbourhood Plan refers to recent viability evidence commissioned by Dorset Council suggesting that the current 50% affordable housing target (set out in Policy LN3 of the adopted Core Strategy) is unlikely to be deliverable and a more realistic affordable housing target being 35%. Macra supports the inclusion of this amended 35% affordable housing target in the emerging Dorset Local Plan (and subsequently reflected in the requirements of Draft Policy 7).
- 4.2 Draft Policy 7 also makes reference to a mix of open market dwellings being provided. The Testing Layout for the Site includes a range of 1-bed to 4-bed dwellings confirming that this can be achieved. The exact mix of dwellings to be provided as part of any future development of the Site can be agreed with Dorset Council at the appropriate time.
- 4.3 Any development of the Site will also be able to accommodate accessible housing, in accordance with the provisions of Draft Policy 7 and to be agreed with Dorset Council as part of a future planning application.
- 4.4 The proposed development of the Site can also address the necessary Habitats Regulations Requirements, to be agreed with Dorset Council as part of any future planning application as appropriate.

Draft Policy 8: The Village “High Street”

- 4.5 Draft Policy 8 relates to land within the village envelope that fronts onto the village “High Street” (as identified on Draft Map 10) and includes the part of Daggons Road adjoining the northern boundary of the Site. Draft Policy 8 states that within this area, retail and other Class E or similar sui generis uses appropriate to a local centre are encouraged, providing that such uses would be compatible with the adjoining land uses. Therefore, the identification of the Site to include some employment land is consistent with Draft Policy 8 given that the site fronts Daggons Road (the “High Street”) and is adjacent to the existing garage site to the east.
- 4.6 Draft Policy 8 suggests that development on the “High Street” should ensure an active frontage that enlivens the streetscene; enable buildings on this frontage to convert to retail or other non-residential uses appropriate to a local centre, even if they are first used for residential purposes; and ensure that suitable provision for customer parking is or can be incorporated as far as this is practicable. These three requirements seem like they could be incompatible and it is could be hard to achieve them all. The requirement for buildings to be convertible to retail or other non-residential uses in the future (but allowing them to be residential use in the first instance) will not result in an optimal design response for these dwellings and designing in customer parking (or the future space for this) is likely to compromise the soft, landscaped frontage that could otherwise be achieved.
- 4.7 For the reasons set out in response to Draft Policy 13 above, it is suggested that some flexibility needs to be added to the wording of Draft Policy 8 (and Draft Policy 13), to recognise that it may not be appropriate to apply all the design principles within Draft Policy 8 to every site fronting the “High Street”. Whilst these design principles may be appropriate to “High Street” sites in the central part of the village,

they may not be equally appropriate for sites at the end of the “High Street” (such as Macra’s Site) which need to deliver homes and form part of the entrance to the village from the countryside beyond.

- 4.8 As set out in response to Draft Policy 13 above, the proposed Testing Layout represents an appropriate design response for the Site which responds appropriately to its location both on the “High Street” but also forming part of the western entrance to the village. The proposed Testing Layout locates the employment land in the eastern part of the Site, incorporating the eastern end of the Daggons Road frontage and located adjacent to the existing garage site to the east (consistent with the provisions of Draft Policy 13), whilst at the same time preserving the verdant character of the remainder of the Daggons Road frontage, with dwellings fronting the street but set behind the existing retained trees, green space and footpaths.
- 4.9 Any requirement to future-proof dwellings on the Site which front Daggons Road for potential conversion to retail or other non-residential uses (as suggested by Draft Policy 8) is too prescriptive and could have a negative effect on the appearance of the Site and its contribution to the character of the entrance to the village from the west. This is because these dwellings would need to be designed with the equivalent of shop front windows and parking provision with direct access to Daggons Road. As demonstrated by the proposed Testing Layout for the Site, it is considered that the proposed development is more appropriate with a primarily landscaped frontage to Daggons Road created by dwellings fronting the street but set behind the existing retained trees, green space and footpaths. The proposed Testing Layout then includes employment land in the eastern part of the Site, forming an active frontage with Daggons Road at this end, closest to the existing development within the village and immediately adjacent to the garage.
- 4.10 Accordingly, some flexibility needs to be added to the wording of Draft Policy 8 (and Draft Policy 13) to recognise that it may not be appropriate to apply all the design principles within Draft Policy 8 to every site fronting the “High Street”. It is suggested that the final paragraph of Draft Policy 8 should be amended as follows:

“Development on the road frontage within this Village High Street area should ~~be designed~~ consider the potential for:

- ~~to ensure that there is~~ an active frontage that enlivens the streetscene;*
- ~~to enable~~ buildings on this frontage to convert to retail or other non-residential uses appropriate to a local centre, even if they are first used for residential purposes;*
- and or*
- ~~to ensure that~~ suitable provision for customer parking ~~is or can~~ to be incorporated as far as this is practicable.”*

5. Conclusion

- 5.1 In conclusion, Macra supports the allocation of the land to the South of Daggons Road under Draft Policy 13 of the emerging Alderholt Neighbourhood Plan. For the reasons set out in these written representations and supporting evidence, the Site represents a sustainable location for a mixed-use development to include residential and employment uses.
- 5.2 However, as set out above, it is suggested that the proposed allocation of Macra's Site under Draft Policy 13 should be amended to refer to the provision of "about 15-20 dwellings". It has been demonstrated within these written representations, in combination with the supporting technical evidence, that the Site can accommodate this level of residential development together with at least 0.2ha of employment land as also referred to in Draft Policy 13. Not only would this better respond to the identified residual housing needs, it would also be consistent with the wording of Draft Policy 14 of the emerging Neighbourhood Plan, which expresses the housing requirement for its associated draft allocation as a range.
- 5.3 These written representations also set out Macra's responses to other draft policies in the emerging Neighbourhood Plan where applicable, including suggesting some amendments to the wording of Draft Policy 8 to provide flexibility and recognise that it may not be appropriate to apply all of the design principles within the draft policy to every site fronting the "High Street" in Alderholt.

Note that the plans and other documents enclosed with this representation can be downloaded from <https://www.dorsetcouncil.gov.uk/w/alderholt-neighbourhood-plan>

Representation number: 29

From: Sean Bates, Land and Planning Director

Organisation: Feltham Properties

Submitted: 25 June 2024

Comments:-

In relation to the aforementioned Neighbourhood Plan Consultation, we commend the steering team on their committed efforts in producing the draft under consideration.

However, this Neighbourhood Plan is not sound as it fails to meet the basic condition set out in primary legislation, namely Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

Paragraph 8 (2) (e) reads:

(2) A draft order meets the basic conditions if—

(e) the making of the order 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),

The basis for the housing requirement in the draft Neighbourhood Plan is primarily the Dorset Council Local Plan January 2021 Consultation. This sets a minimum housing requirement of 192 homes in Alderholt over the plan period. However, the plan was abandoned at an early stage and did not undergo the materially significant stages of consultation and examination. The housing requirement contained within the Neighbourhood Plan is therefore untested and cannot reasonably be relied upon to form a basis for the subject Neighbourhood Plan.

It further appears that there are no ‘made’ Neighbourhood Plans in the former East Dorset policy area. This means that the basis of the housing requirement (namely the East Dorset and Christchurch Core Strategy and the Dorset Local Plan Consultation January 2021) has not been tested as an evidence base for a Neighbourhood Plan housing requirement.

In the absence of a Dorset Plan to any degree, the East Dorset and Christchurch Core Strategy 2014 is the ‘current’ Local Plan for the area, however, it also cannot be relied upon for housing requirements as it is materially out of date and as such it is difficult to interpret that the Neighbourhood Plan accords with any relevant Local Plan.

Planning Guidance elaborates on circumstances where a Neighbourhood Plan is more advanced than its Local Plan.

The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimize any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies.

Where a neighbourhood plan is brought forward before an up-to-date local plan is in place, the qualifying body and the local planning authority should discuss and aim to agree on the relationship between policies in:

- *the emerging neighbourhood plan*
- *the emerging local plan (or spatial development strategy)*

- *the adopted development plan*
- *with appropriate regard to national policy and guidance.*

There is clearly a question of degree when considering the relevance of prematurity. In this instance, it is not only the case that the planning district lacks an up-to-date plan. The situation is far worse because six authorities have now merged into a single larger authority and its Local Plan process was abandoned before it had produced its first plan. It is not materially recommenced at the time of writing. Following the further abandonment of the now defunct East Dorset and Christchurch plan update, the only vaguely relevant plan is the East Dorset and Christchurch Core Strategy 2014. This is badly out of date and cannot be considered to be a relevant adopted Local Plan. **This Neighbourhood Plan has hence been produced in a policy vacuum where there is effectively no Local Plan, emerging or adopted.**

The main thrust of Planning Guidance as it relates to Neighbourhood Planning is the management of potential disconnectedness between Local and Neighbourhood Plans. The circumstances in this case are severe and the Dorset authority should properly pause further consideration of the Alderholt Neighbourhood Plan until such time as its own plan has made sufficient progress that the two plans can move forward with some semblance of coherence.

Representation number: 30

From: Mr Martin Hawthorne, Planning Director

Organisation: Highwood

Submitted: 25 June 2024

Comments:-

1. This document comprises the response of Highwood to the Alderholt Neighbourhood Plan (ANP) Submission Reg. 16 consultation. We have reviewed the submission version of the plan, having regard to the need to meet the Basic Conditions and set out our comments below.

Background

2. Highwood are promoters of land at Cross Farm, Station Road, Alderholt (LA/ALDE/004) – a site of circa 6.3ha, which has unique potential within the village to meet local needs for housing, employment, public open space, SANGS, and delivery of the first part of the Alderholt to Fordingbridge Trailway.

3. We have previously met with Parish Councillors and submitted a Vision Document to the Council for consideration in May 2023. Despite being identified as one of the site options consulted upon in 2023 and assessed in the Sustainability Appraisal as a reasonable alternative option, we are disappointed to see that the site was not included as an allocation in the pre-submission ANP, and remains unallocated in this version of the plan, particularly given the assessment set out in the Sustainability Appraisal prepared by AECOM and our previous Reg 14 representations. We believe this represents a missed opportunity for the village and conclude that the basic tests are not met as a result. A copy of the Vision Document is enclosed again for ease of reference. It demonstrates that Land at Cross Farm can deliver:

- Open market housing (draft ANP Policy 7);
- Affordable housing (draft ANP Policy 7) – where other committed sites in the village are either not providing any at all, (or only a reduced non-policy compliant level) due to viability issues, and those sites that are included in the draft ANP will likely not provide affordable housing to the same extent as would be achieved Cross Farm;
- Employment work-space (draft ANP Policy 10) – where other sites included in the draft ANP will not;
- Public open space and SANGS (draft ANP Policy 16);
- Linkages to the existing public rights of way network and the first section of the proposed new Alderholt to Fordingbridge Trailway (draft ANP Policy 9) - where other sites included in the draft ANP will not.

4. Development of Land at Cross Farm would deliver these much-needed amenities through a modest extension of the village, that would protect and retain Alderholt's character, its compact form and links to the former railway and surrounding countryside. Allocation of Land at Cross Farm could assist the Parish Council in ensuring that the ANP meets the Basic Conditions and achieve the Vision and Objectives set out in the plan.

Basic Conditions

5. To proceed to referendum, the ANP must meet the Basic Conditions as contained in the Planning Practice Guidance (PPG), the Localism Act (2011) and paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). These are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- d) the making of the order contributes to the achievement of sustainable development,
- e) the making of the order 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),
- f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and
- g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

6. In relation to a), the National Planning Policy Framework (NPPF) is key and was most recently updated in December 2023 – after the ANP was published for Reg. 14 consultation, which was unfortunate.

7. The NPPF makes clear the importance of the hierarchy of Plans, which in this case means that the ANP must be in general conformity with the strategic policies for the area. In situations where development plan policies are out of date, paragraph 68 of the NPPF applies. It is noted that an indicative figure for the housing requirement, in the absence of an up to date relevant strategic policy, is being used for the ANP based on discussions held with Dorset Council.

8. The ANP is being brought forward under the existing development plan for the area which includes:

- East Dorset and Christchurch Local Plan Part 1 - Core Strategy (April 2014); and
- “Saved policies” from the East Dorset Local Plan (January 2002, saved June 2014)

9. This is a far from ideal situation as the development plan is clearly out-of-date. This applies to many aspects of policy in the pursuit of sustainable development, but is particularly obvious in relation to the housing requirement set out in the development plan, which was based on a SHMA dating back to 2012, with other housing delivery and countryside protection policies also outdated and not in compliance with current national policy and guidance.

10. As a result of the NPPF changes, areas which are subject to made NPs have been given greater protection from the presumption in favour of sustainable development (para 11d) by virtue of a revised para 14. The changes mean that proposals which might otherwise be considered ‘sustainable development’ under a paragraph 11(d) ‘titled balance’ for proposals which would not accord with a newly adopted NP would be instead judged by para 14 balance wording. I.e. the titled balance is removed in situations where a NP has been made within five years. A difficulty arises in the Alderholt/Dorset situation as a result of this change, where the housing policies contained in the adopted development plan (the East Dorset Local Plan) are so out of date and based on evidence

that is so old.

11. At the time of the Reg. 14 consultation, Dorset Council were in the process of preparing the Dorset Council Local Plan (DCLP), which was subject to Options consultation in 2021 and was scheduled to have an anticipated adoption target of Q2 2026.

12. Dorset council have, as a result of a committee resolution of March 2024 adopted a new Local Development Scheme and local plan preparation timetable with an anticipated likely timescale of adoption of May 2027.

13. The risk in this situation is that not enough housing is to be planned for to cover the whole NP period (to 2034) in the absence of an adequate up to date strategic policy and such a low number being proposed in this neighbourhood plan. It is of utmost importance for the ANP to provide sufficient housing with housing numbers and allocations to meet needs for the needs of the community for the full plan period. Not just to 2027 when a review can be started. Not doing so risks an effective moratorium on housing until 2027 – being optimistic.

14. It may be prudent to review the ANP earlier, to appropriately reflect the aims and objectives of the DCLP as it emerges, rather than once the Local Plan is adopted to avoid further delay in the delivery of sustainable development. By appropriately assessing the evidence and reasoning of the DCLP and working collaboratively with Dorset Council will alleviate the risk of the ANP becoming quickly out of date post-being made.

15. The draft ANP may also need to be reviewed post-publication of a revised NPPF anticipated following the imminent change of government in July 2024.

Vision and Objectives

16. Given the high prominence within responses to the 2017 and 2019 household surveys (ref. Paras A1.8-9 in the ANP) and in the context of the ongoing national housing crisis and the provisions of the NPPF, the necessity to adequately plan for and provide affordable housing to meet local needs should be included prominently within the stated 'Our Objectives' on page 11. It is a key issue for the village and its residents and needs to be reflected as an objective.

Policy 7 – Meeting Local Needs – Housing

17. As set out above, the development plan is out-of-date with key housing and countryside protection policies out of date and not in accord with current national policy and guidance – e.g. the housing requirement is based on a SHMA dating back to 2012. In this scenario, the ANP's indicative housing target has been agreed with Dorset Council to be 192 dwellings for the plan period (2022-2034), which, taking account of existing commitments means just 50 new dwellings are to be planned for, beyond those already committed, to 2034. This risks the ANP not meeting the Basic Conditions by not planning for or delivering enough homes and in particular, affordable homes to meet need (see below).

18. The approach of agreeing an indicative target for the Plan in the context of strategic policies for housing being out of date accords with the first part of Para 68 of the NPPF of Dec 2023. However, paragraph 68 also stipulates that the number should, take into account factors such as the latest

evidence on housing need (e.g. the household surveys), the population of the neighbourhood area (around 3,200 residents, 2021 census) and the most recently available planning strategy of the local planning authority.

19. The most recently available planning strategy of the LPA in the context of a hopelessly out of date development plan could reasonably be argued to be the Reg.18 Dorset Local Plan. Whilst the emerging plan timetable changed in March 2024, the updated LDS states on page 5 that, “Work commenced on the Dorset Council Local Plan at the point that Dorset Council was formed in 2019. A consultation on a draft of the plan was undertaken in January 2021. This information will be used to inform the new-style Dorset Council Local Plan”.

20. This sets out a housing target, which takes account of the fact that across the authority large areas are constrained by high-level constraints that restrict housing supply – e.g. Green Belt and National Landscapes.

21. The most recent planning strategy, the Reg.18 Plan identified a potential level of housing for Alderholt expressed as two possible options:

1. around 300 new homes and 0.25ha commercial and
2. significant expansion – comprising a series of sustainable urban extensions around the settlement to create a self-contained ‘town’ (to be quantified).

22. This is reflective of the fact that Alderholt, including Land at Cross Farm is unconstrained by Green Belt or National Landscape and has potential to supply a significant number of homes to meet the needs of the authority.

23. Policy DEV9 (Neighbourhood Plans) of the draft Dorset Local Plan states that “where provision is made for housing, the housing requirement figure for a neighbourhood plan area, set out in Appendix 2, should be met and where possible exceeded.” Appendix 2 outlines a minimum 192 dwellings for Alderholt, but with an asterisk noting that there is an optional additional site for the village.

24. Given the clear thrust of national policy, including para 60 of the NPPF which identifies the Government’s objective of significantly boosting the supply of homes and the latest planning strategy of the LPA suggesting neighbourhood plan numbers expressed should be exceeded where possible, not just in the village envelope, and options that include 300 homes or significantly more, the ANP should make provision for more homes than is currently proposed to be considered to meet the Basic Conditions in this regard.

25. Through allocating additional homes, more local families can benefit from more housing choice, and affordable homes (see below) and would provide the ANP with reduced risk that it will need an early review due to updated evidence and options emerging through the DCLP preparation process.

26. It would also avoid an effective moratorium on other sustainable development within five years of adoption of the NP brought about by the changes to NPPF through paragraph 14 of the December 2023 version of the Framework. Some element of flexibility should be provided.

Policy 7 - Affordable Housing

27. The Housing Target Paper in Appendix 2 of the ANP describes how a household surveys took place in 2017 and 2019, data that is now almost five years old, but which suggested that there was a need at the time for 77 affordable homes (albeit only 4 of the households that responded were on the AH register at the time and latest register figures suggesting 18 to be needed based on the Council's analysis).

28. The ANP approach to Housing expressed through Policy 7 will not provide the affordable housing required to meet local need identified in household surveys. This is partly due to existing commitments forming a large proportion of the indicative housing target – made up of permissions that will deliver levels of affordable housing way below local plan policy requirements. This is demonstrated within the ANP Appendix 2 Housing Target Paper Table extracted below:

29. Extant permissions will therefore deliver 138 dwellings of the 192 indicative housing target, just 7 (seven) affordable homes (5%) will be delivered.

30. Existing development plan policy requires 50% affordable housing, meaning extant permissions should have delivered 69 affordable homes for the village. The sad reality within the context of a national housing and cost of living crisis is that the ANP will deliver a shortfall of 64 against current development plan requirements on extant permissions alone, not counting any further shortfall that may arise should the allocated 50 additional future new homes in the plan carry this delivery trajectory forward. If the emerging DCLP requirement for affordable housing is applied (35%), the extant permissions should have delivered 48 affordable homes. A shortfall in the ANP of 41.

31. Further, Option 1 of the DCLP outlined that 300 dwellings could be required at Alderholt. At 35% affordable housing, this would deliver 105 affordable dwellings for the village. The ANP as drafted will not deliver anything near that level of affordable housing.

32. The ANP cannot be considered to meet the Basic Conditions in relation to affordable housing – it does not accord with the strategic policies of either the current development plan or the latest planning strategy set out in the emerging DCLP or the NPPF. Additional allocations should be included in the future version of the ANP to address these shortfalls. Land at Cross Farm can deliver affordable homes in accordance with policy and make a significant contribution in this regard.

Policy 7 – HRA and Effects upon Dorset Heathlands

33. It is important that the plan's policies can be delivered and meet the Basic Conditions. This includes how this is going to be achieved in relation to the requirements of the Habitats Regulations and the Dorset Heathland SPD, regarding provision of adequate HIPs and financial contributions if required to support housing policies including future windfall development within the village envelope.

Policy 9 – The Trailway

34. We support this policy which accords with the provisions of the emerging DCLP. We have demonstrated in representations made previously to both Dorset and the Parish Council and in the enclosed Vision Document that Land at Cross Farm incorporates the railway embankment along which the proposed Trailway will pass through the site along its northern boundary. Highwood are uniquely placed to be able to deliver this significant first stage of the Trailway Project to the benefit

of the village and wider community along with improvements to the wider public rights of way network as part of development proposals for Cross Farm.

Policies 12-14 Site Selection

35. We are disappointed that Land at Cross Farm is not included in this version of the ANP.

36. The table below summarises the Dorset SHLAA Review (Table 4.1 of the AECOM Site Options and Assessment Report) published alongside Reg 14 for Cross Farm:

37. We support the fact that the site was included in the Neighbourhood Plan site assessment, but object to the capacity assessment being undertaken on the basis of 30 dwellings and not the 60 set out in the SHLAA (our Vision document suggests capacity for circa 79, but this would be subject to further review at planning application stage). We have provided evidence to demonstrate that surface water flooding will not preclude development of circa 79 dwellings as shown in the Vision Document. 60 is a more reasonable basis for assessment at this stage than 30. This would deliver 21 affordable homes at 35% provision. The site assessments have therefore underscored the site in terms of potential benefits arising from the provision of additional homes, particularly affordable housing.

38. The AECOM site Red-Amber-Green (RAG) assessment for Cross Farm resulted in 10 positive green scores and three amber, zero red (the only site that has zero red of those assessed) – one of which should have also been green, namely “Ability to meet the emerging Neighbourhood plan housing requirement (50 dwellings) for reasons set out above.

39. Para 5.11 of the AECOM report states re next steps:

40. The SEA report accompanying this Reg 19 version of the plan assesses the reasonable alternatives to the allocated sites, including Cross Farm. This (see Table 5.1) scores Cross Farm, under Site 004 as having a significant effect on Landscape and a red negative score given. This should be scored ‘no’ given the site is so well screened by mature boundary vegetation to the west and north of the site and the existence of a high railway embankment to the north which will fully omit (not likely omit as suggested in para.5.11) views to the north. There is existing development to the east and south.

41. Given the scoring and for reasons set out below regarding comparisons on scoring with each allocated site, it is difficult to comprehend why Cross Farm was not allocated.

Policy 12 – Alderholt Nursery

42. We have reservations about this allocation. Compared to Cross Farm RAG, this site scored less positively, with only 6 green, 6 amber and one red. It seems absurd that such a score should lead to an allocation when Cross Farm is evidently more sustainable a development based on the AECOM assessment.

43. The Site Assessment was on the basis of no employment proposed at this site, yet the consultation boards Autumn 2023 factored in employment and the proposed NP policy does not mention employment at all. The public consultation votes are therefore questionable for this site as the residents voted towards a scheme that was before and after consultation never going to deliver

employment land. Cross Farm will deliver employment.

44. The Site Assessment acknowledges the scheme will likely not deliver policy-compliant affordable housing due to it being brownfield land and due to possible viability issues. Cross Farm will deliver affordable housing as per policy.

45. The site assessment states it would require Developer Contributions to assist with what is Policy 9 in the draft plan of funding the railway project. Cross Farm will open up a portion of the Railway directly without need for contributions.

Policy 13 – Paddock South of Daggons Road

46. We have reservations about this allocation. Compared to Cross Farm RAG, this site scored less positively, with only 8 green, 4 amber and one red. It seems absurd that such a score should lead to an allocation when Cross Farm is evidently more sustainable a development based on the AECOM assessment.

Policy 14 – Land South of Blackwater Grove

47. This site is allocated for 15-20 dwellings but it is not demonstrated that access to the site can be achieved. We are concerned that this site may not be deliverable due to inadequate access which is a potential fundamental flaw.

48. Compared to Cross Farm RAG, this site scored less positively, with only 6 green, 6 amber and one red. It seems absurd that such a score should lead to an allocation when Cross Farm is evidently more sustainable a development based on the AECOM assessment.

Conclusion

49. In light of the above, we urge the Parish Council to review the ANP to ensure that the plan will meet the Basic Conditions. The ANP should include an allocation for development at Land at Cross Farm to assist in this regard, in accordance with the AECOM Site Assessment report findings and the site selection process criteria. This may or may not be alongside removal of exiting sites that are proposed to be allocated but which scored less well in sustainability assessment as demonstrated by the AECOM reports or where there are significant doubts over their delivery and/or where they will not provide policy compliant affordable housing.

50. Development at Cross Farm scored very positively in the AECOM report and will evidently meet the vision and objectives of the ANP better than other alternatives – not least through delivery of over 50 homes, with policy compliant affordable housing and facilitating delivery of the Alderholt to Fordingbridge Railway, which no other site can deliver. It is a sustainable option for development and suitable, deliverable and available.

51. We will be more than willing to continue engagement with the parish council and local community on bringing forward a development with all the benefits to the village it would bring.

The attached **Vision statement** for the Cross Farm site is available to download from <https://www.dorsetcouncil.gov.uk/w/alderholt-neighbourhood-plan>

Representation number: 31

From: Mr Adam Bennett, Senior Associate Planning Consultant

Organisation: Ken Parke Planning Consultants Ltd, on behalf of Commercial Freeholds Limited

Submitted: 25 June 2024

Comments:-

Letter attached for the next 18 pages.

Dorset Council
Community Planning Team
Allenview House
Hanham Road
Wimborne
Dorset
BH21 1AJ

BY EMAIL – neighbourhoodplanning@dorsetcouncil.gov.uk

25th June 2024

Your ref: Regulation 16 Consultation

Our ref: AB/2618

Dear Sir/Madam

Re: Alderholt Neighbourhood Plan – Regulation 16 Consultation Response – Land South of Blackwater Grove (Site: LA/ALDE/009) (Policy 14) – on behalf of Commercial Freeholds Limited (Landowner)

The following letter is prepared in response to the Alderholt Neighbourhood Plan Regulation 16 Consultation and sits alongside the earlier responses provided at the Regulation 14 consultation stage.

Representations are prepared on behalf of Commercial Freeholds Limited in their capacity as landowner of Site Ref. LA/ALDE/009 Land South of Blackwater Grove; herein referred to as Land South of Blackwater Grove, Alderholt ('the site').

For the purposes of brevity, the Alderholt Neighbourhood Plan is referred to herein as the 'ANP'.

We would like to congratulate Alderholt Parish Council and the Neighbourhood Plan Working Group (NPWG) on their hard work in preparing the plan. Whilst we support in general the overall direction of the ANP and the policies as set out, we have some specific comments which we would ask that the Independent Examiner take in to account and which would, in our view, allow the ANP to achieve a sustainable pattern of development, which will best meet for the needs of the settlement and the rural villages and hamlets in its periphery and reflect the role of Alderholt as a Rural Service Centre settlement, as it is designated within the Christchurch and East Dorset Local Plan Part 1: Core Strategy (2014); which remains the Local Development Plan document in force for the area. Moreover, the settlement has been earmarked for a

more transformational level of growth by Dorset Council, as was reflected within the initial Regulation 18 Consultation in respect of the Dorset Local Plan; which whilst on hold at present, will provide the overarching Local Planning Policy document directing growth within the Authority Boundary.

On behalf of our client, as an **Executive Summary** we write to confirm the following:

- We support the overall spatial strategy as set out within the ANP.
- We support the need to deliver additional housing to meet local needs, but also having regard for the status of the settlement as a Rural Service Centre, we consider that the settlement can support additional residential development that reinforces its role as a provider of community leisure and retail facilities in order to support adjacent rural communities.
- We support proposed Policy 14 which seeks to allocate Site 009: Land South of Blackwater Grove, as identified on Map 10, for housing development and accessible greenspace.
 - We however consider that Site 009 Land South of Blackwater Grove, having regard for the desire to make best and most efficient use of land, could be allocated for a greater level of housing, 40-50 units, which could still be readily accommodated on site and the level of greenspace sought by the ANP delivered.
 - We are of the view that proposed Policy 14 should be amended to allow for a greater level of development to be delivered, which would better support the role of Alderholt as a Rural Service Centre.

Legal Compliance and Basic Conditions

The Alderholt Neighbourhood Plan (ANP) has been prepared in accordance with the provisions of the Neighbourhood Planning (General) Regulations 2012 ('the Regulations').

Alderholt Parish Council are the qualifying body responsible for the preparation for the Neighbourhood Plan by way of the NPWG. The plan has therefore been prepared by a qualifying body in accordance with Section 61F of the Town and Country Planning Act 1990.

The Neighbourhood Area was designated following an application made to Dorset Council as Local Planning Authority, on 25th March 2019, and identifies the area to which the ANP relates in accordance with Section 5 of the Regulations.

As required by the Regulations, the Alderholt Parish Council have undertaken the necessary stages in publicising the ANP for public consultation at Regulation 14 stage. Following submission of the ANP to Dorset Council, the Local Planning Authority have now published the Regulation 16 consultation.

At the Regulation 16 Stage, the Local Planning Authority are required to publicise each of the Neighbourhood Plan documents set out at Regulation 15(1) of the Regulations; comprising:

- A map or statement which identifies the area which related to the proposed Neighbourhood Plan;
- A consultation statement
- The proposed Neighbourhood Plan; and,
- A statement which explains how the Neighbourhood Plan meets the requirements of Schedule 4B, Paragraph 8 of the Town and Country Planning Act 1990

A Neighbourhood Plan must also be supported by an Environmental Report in accordance with Regulation 12 (Paragraphs (2) and (3) of the Environmental Assessment of Plans and Programmes Regulations (2004).

In respect of these basic conditions, the NPWG have submitted to Dorset Council the requisite information, and this has been formally listed on the Council's website and made available to the public to view and respond in relation to. The obligations of Regulation 15 (1) of the Regulations have been appropriately complied with and with respect to these basic conditions therefore the ANP has complied with the legislation.

Basic Conditions Statement

The ANP is supported by a Basic Conditions Statement which confirms that the ANP has been prepared in view of the relevant Local and National Planning Policy documents; being the Christchurch and East Dorset Local Plan Part 1: Core Strategy (2014) (the 'Core Strategy') and its related supplementary planning documents (SPDs), and the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

The Basic Conditions Statement claims that Alderholt's role as one of the Rural Service Centres within the Plan Area is one where there are no strategic allocations or expectations of growth, however Policy KS2 of the Core Strategy is clear that the Rural Service Centres will be the main providers for the rural area where residential development of a scale that reinforces their role will be allowed; as the policy excerpt at **Figure.1** reflects:

Figure.1 – Christchurch and East Dorset Core Strategy – Policy KS2

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

Whilst it is true to say that there were not 'strategic sites' allocated at Alderholt as part of the Core Strategy, it is not true to say that there is no expectation of growth occurring at this settlement. The Core Strategy indeed recognises that the Rural Service Centres including Alderholt will be the main providers of housing growth supporting their own vitality and viability and that of surrounding rural communities.

It is also the case that, having regard for the Regulation 18 Draft Dorset Local Plan (2021) (the 'DDLDP'), the aspiration of the Local Planning Authority was for Alderholt to meet a more strategic level of growth as reflected within the excerpts from the section of the plan specifically relating to Alderholt and its opportunities for growth, as cited below at **Figure.2**.

Figure.2 – Regulation 18 Draft Dorset Local Plan (2021) – Section 18 – Alderholt

- 18.3.1. As one of the largest villages in Dorset, some additional housing would help to meet local needs in the period up to 2038. This would be a relatively small amount of development that would also deliver some additional facilities for the village, primarily to meet local needs. Links with Fordingbridge would also be improved.
- 18.4.1. Small-scale development at Alderholt could be allocated aimed at meeting the needs of the existing settlement over the plan period. It is estimated that this need would be for approximately 300 new homes over the plan period, along with improved community facilities. The delivery of this level of development could be helped through the preparation of a neighbourhood plan.
- 18.4.2. The second option of significant growth would need to deliver a much-enhanced settlement. There would be a need for significantly improved employment opportunities to enable people to work locally rather than having to drive (which is the current situation) to the nearby centres of Bournemouth, Ringwood, Southampton and Salisbury. Additional facilities would also be necessary to enable everyday needs to be met within the expanded settlement including the provision of new schools across all tiers, health facilities, shops and community space. All of these would need to be planned and delivered as a centre to improve their viability. Public transport provision would need to be enhanced to enable better access to nearby towns including close links to the town of Fordingbridge.

The DDLP therefore suggested that the housing need for Alderholt over its suggested plan period from 2021-2038 comprised 300 homes. With the indication that this level of growth could be planned for through a Neighbourhood Plan.

It is accepted that the DDLP can only be attributed limited weight, however the level of growth which was being deliberated is a relevant factor in considering the future expectations for growth at Alderholt having regards for its relatively unconstrained nature when compared with the other settlements within the eastern area of Dorset Council's Plan Area.

Indeed, the PPG confirms at Paragraph: 009 Reference ID: 41-009-20190509 that:

“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.”

The level of housing growth therefore deliberated by the DDLP is therefore of relevance to the consideration of the basic conditions against which the Neighbourhood Plan should be tested and indeed this proposes a higher level of growth than the ANP suggested, at 192 dwellings (16 per annum) over the next 12 years. The figure of 300 homes set out within the DDLP; bearing in mind the minimum plan period of 15 years, can be assumed over a suggested plan period of 15 years which amounts to 20 dwellings per annum.

On the basis of 20 homes per annum (240 over the 12 year plan period) it could be argued therefore that the ANP should provide for an addition 48 homes.

It is considered therefore that, whilst the spatial strategy of the ANP is supported, there is significant scope to increase the level of development planned for to better reflect the level of growth which Dorset Council has identified should be achieved over the long term in Alderholt.

It is not necessary for all of this growth to be planned for at this stage, however where opportunities exist to make best and most efficient use of land; including in respect of our client's site – Site 009: Land South of Blackwater Grove – the opportunity should be grasped. Development land is a finite resource and arbitrarily restricting growth in a manner which results in an inefficient development of land is neither reasonable nor appropriate.

We consider therefore that there is scope to substantially increase the level of development envisaged by Policy 14 of the ANP; enabling a further 25-30 homes to be delivered within the ANP Plan Period.

We consider that the proposed Policy 14 should be reworded as follows; with the amendments shown principally in bold:

Policy 14. Land South of Blackwater Grove

*Land south of Blackwater Grove (as shown on Map 10), is allocated for **about 40-50 dwellings and accessible greenspace.***

***New dwellings should be focussed towards the eastern end of the site; within the area south of Blackwater Close and 9 Blackwater Grove, but this should not prejudice the delivery of an alternative arrangement which best responds to the specific site constraints.** Development should avoid areas at potential risk from groundwater flooding (a comprehensive flood risk assessment will be required to inform the planning application). The design, mix and layout should be in line with Policies 1 – 7, and should respect the amenity of adjoining residential properties.*

Vehicular access to the site will be from Blackwater Close. The existing pedestrian access from Ringwood Road should be improved. The development should not prevent the formation of future connections to 9 Blackwater Grove and land to the south in line with Policy 2.

Landscaping will be required along the site boundaries with adjoining countryside and should reinforce the tree clump on the southwestern corner of the site. The development will be required to secure an appropriate Sustainable Alternative Natural Greenspace (SANG) to mitigate for the recreational impacts of the new dwellings upon the nearby Dorset Heathlands protected designation. This heathland infrastructure project should be made available prior to occupation of the dwellings. A combined landscaping, biodiversity and drainage layout plan will be required to demonstrate how the development considers these issues comprehensively.

This level of growth would not change the conclusions of the Basic Conditions Statement that the level of growth planned for can reasonably be delivered without reliance upon the expansion of existing community, leisure or retail facilities. But notwithstanding this, the additional housing growth will support the delivery of additional affordable housing and the vitality and viability of those existing facilities representing sustainable development without harm to the character of Alderholt as a settlement.

Indeed, we propose no increase to the development area proposed by the ANP, simply that housing should be built at a realistic density which makes best and most efficient use of the land as Section 11 of the NPPF specifically supports.

We have no further comments in respect of the Basic Conditions Statement. We consider that the ANP is broadly in compliance with the Regulations and indeed that the Independent Examiner is capable of finding the plan sound. We however consider that there is also scope for the Examiner to find that there are additional housing growth opportunities within the Site 009 – Land South of Blackwater Grove, which the

Alderholt Neighbourhood Plan - Development Management Policies

Whilst we raise no comment or objection to the majority of the policies as proposed, we do wish to pass specific comment in respect of the ANP *Policy 7 – Meeting Local Needs – Housing*.

Policy 7 – Meeting Local Needs – Housing

The ANP sets out clearly its spatial approach, combining a combination of reliance upon the delivery of existing planning permissions, the allocation of three additional sites for principally the delivery of housing and some limited employment, and otherwise to rely upon infill development within the settlement boundary which can come forwards on a windfall basis.

We have no objection in principle to the overarching spatial strategy; which is consistent broadly with the approach taken within the Local Development Plan which the ANP will form part of.

With respect to affordable housing, it is noted that the ANP seeks to require the delivery of First Homes. The National Planning Policy position on this, as set out within the Written Ministerial Statement dated 24th May 2021 is that sites should seek to deliver 25% of homes as First Homes. The ANP is consistent with this aim.

It is noted that; at odds with the Local Development Plan which generally advocates for a 70/30 split between rented and intermediate tenure, the ANP instead expects a 50/50 provision. This is however supported and will deliver a more diverse community and support better the laudable aim of home ownership for a greater proportion of the general population. It is noted that there is flexibility in this mix where required including to consider viability.

With respect to affordable homes delivered, the focus is noted to be on 1, 2 and 3 bedroom properties. Again, in principle, this is supported and represents the need for this type of housing as expressed within the Housing Needs Assessment which underpins the DDLP.

We do however consider that to prescribe a mix in accordance with the current position in time does not represent an adequately future proofed position. We consider that whilst 'Table 1' as set out within the ANP represents the position at the time of writing, this could well change significantly.

By the same note, we do not agree that it is appropriate to seek for the open market home mix to be restricted in line with Table 1 given that this specifically affects the flexibility of developers in respect of individual sites and in relation to the matter of viability and changes in economic circumstances. It is important that policies can be appropriately proactive but also react to changes in circumstances and in this regard, we would favour a change to Policy 7 to read as follows:

Affordable Housing

The overall provision of affordable housing will be guided by the requirements set in the Local Plan.

At least 25% of affordable housing should be delivered as First Homes, as defined in national policy. The remaining affordable housing should be split between affordable housing for rent (including social housing) and affordable home ownership (including shared ownership). The overall split between affordable home ownership and affordable rented should aim to be 50:50, but a different split may be permitted if justified by local circumstances, local needs, or local viability considerations.

*Affordable home sizes should primarily deliver 1, 2 and 3 bedroom houses in line with Table 1 and the latest information on housing needs for those with a local connection as recorded in the Dorset Council affordable housing register; **however the housing***

mix is not fixed and appropriate evidence or justification of an alternative mix based on local need at the time of an application will be taken in to account.

Where affordable housing is provided, this should be tenure-blind and made on the basis of prioritising people in housing need who have a local connection to the Neighbourhood Plan area (based on the local connection criteria of the Dorset Housing Allocations Policy), cascading out to the adjoining parishes if there is no local need.

Market Housing

The policy does not prescribe a dwelling mix to ensure appropriate flexibility is maintained in the consideration and determination of applications.

The housing mix set out within 'Table 1' indicates a desire for more 2 and 3 bedroom houses and a smaller proportion of 1 and 4+ bedroom houses at the time of the preparation of the plan and support will be given particularly to sites that are able to show appropriate regard has been given to this position.

We have no further comments in respect of any other Development Management policies.

The Alderholt Neighbourhood Plan Strategy

The ANP proposes to allocate three principal sites for development; having regard for a public consultation exercise undertaken with local residents and on the basis that these are considered to best meet the overarching objectives of the ANP as discussed above.

The three sites identified are as follows:

1. Alderholt Nursery - identified for 20 homes with a pedestrian link to the village that avoids the need to walk along Ringwood Road;
2. Paddock South of Daggons Road – identified for 15 homes and small scale employment units along its frontage; and,
3. Land South of Blackwater Grove – identified for 15-20 homes; and a sizeable green space.

The strategy as proposed is considered to represent a culmination and consideration of both the public consultation exercise and the technical work undertaken by AECOM within the Site Allocations and Assessment Document (2023).

The Site Allocations and Assessment Document (2023) considers the three sites as follows:

1. LA/ALDE/002 Alderholt Nursery – capacity of 21 dwellings
2. LA/ALDE/006a South of Daggons Road – capacity of 16 dwellings
3. LA/ALDE/009 Land South of Blackwater Grove – capacity of 50 dwellings

Having regard for the AECOM assessment and the basis under which the ANP seeks to allocate Site 009 – Land south of Blackwater Grove, we comment as follows in respect of the specific site policy, Policy 14.

Land at Blackwater Grove – Site Policy 14

We have promoted Land at Blackwater Grove for a considerable number of years, and this land parcel was included within successive draft Local Development Plan documents by the then East Dorset District Council. With none of the previously development plan documents having come to fruition and proceeded past their initial consultation stages due to local authority reorganisation and mergers, the site has remained un-allocated, but nonetheless available and suitable for development.

As discussed above, the site, as far as considered within the AECOM assessment, scores highly in terms of its proximity to the village core; its ability to deliver sustainable pedestrian connections and with respect to its location up against the existing built area of the settlement in a manner which would see its development preserve entirely the compact form of the settlement. The AECOM assessment considers the site to have a capacity of around 50 dwellings.

The site measures approximately 3.6ha in area, with the ANP suggesting that 2ha of the land be developed with a total of 15-20 dwellinghouses. With reference to the above densities of development discussed, the development of this site in the manner suggested, would result in a density of around 10dph, and if considered in the frame of the full 3.6ha site area, a density of approximately 5.6dph.

This density of development is unreasonably and unrealistically low and would result in a significantly inefficient use of the land contrary to the direction of the NPPF and indeed the desire to make best and most efficient use of land. Indeed, developing at this density would be significantly out of step with the neighbouring residential development, which itself is at a higher density. The below **Figure.3** identifies three immediately contiguous clusters of development the density of the three areas is listed below for reference:

- Area 1 – 2.36ha in area including 66 dwellings at a density of 28dph
- Area 2 – 2.02ha in area including 30 dwellings at a density of 15dph
- Area 3 – 0.94ha in area including 27 dwellings at a density of 29dph

It is unreasonable to expect that the Landowner bring forward such a reduced density of development upon the site; particularly when the AECOM assessment suggests the site has a capacity of around 50 units. It is acknowledged within the assessment that this site alone could practically meet the housing needs of Alderholt over the proposed plan period having regard for the ANP's assessment of housing need. It is however again noted that a higher level of growth has been suggested within the Evidence Base which supports the DDLP.

It is not appropriately forward thinking and indeed representative of poor planning to suggest that the site should be delivered for a reduced number of homes when having regard for the National Policy Position that efficient use should be made of land as Paragraphs 128 and 129 of the NPPF advocates, and moreover that regard should be had for the area's character and setting when considering what comprises an appropriate density.

Paragraph 129 of the Framework in particular makes clear that, where there is an existing or anticipated shortage of land for meeting identified housing needs; as has been the case historically within East Dorset, which for many years has been unable to demonstrate a delivery housing land supply, planning policies and decisions should avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. This particular point cannot and should not be reasonably ignored through the Neighbourhood Plan making process. It is important that an optimal use is made of land in a manner that is appropriate for local character.

Figure.3 – Density Assessment – Immediate Context to Land South of Blackwater Grove



Land is a finite resource and poorly planned development will lead to inefficiencies that require more land to be released for development in the future in more sensitive locations of which would prejudice the character and form of Alderholt as a settlement; in the frame of the defined objective of the ANP to preserve precisely these features and protect the countryside from unnecessary incursion.

The land parcel is bound as a whole by existing residential properties from east-west. There is no reason why a significant area of the site should be excluded as a development opportunity. The site is more than capable of delivering a much greater number of dwellings and even if 50 homes were delivered on the site, this would still result in a density of development of approximately 13.8dph, once again significantly less than that which is proposed on both of the other suggested site allocations. Indeed, assuming that 2ha of the site is developed for housing as the ANP policy proposes, the provision of 50 dwellings would result in a density of 25dph, still materially lower than the immediate pattern of development as the above study indicates. It should be noted that these previous housing developments do not incorporate a significant quantum of open greenspace, which Land South of Blackwater Grove would also provide.

We do not consider that the ANP has looked at the sites consistently in this respect with a much greater density of development proposed on the other sites, despite both sites being more removed from the core of the settlement than Land South of Blackwater Grove and being situated in the context of materially lower density development.

The ANP has the opportunity to deliver a much more sustainable core to the settlement through the allocation of Land South of Blackwater Grove for a more appropriate number of dwellinghouses. Even if only 2ha of the site were to be built upon as is suggested, the delivery of a scheme of 40-50 dwellinghouses would only result in a density of 20-25dph, consistent with or below the density of the other proposed allocations.

With reference to the suggestion within the ANP that development be limited to only the eastern part of the site, and that the western end of the site be delivered as a large SANG; which misses entirely the opportunity to deliver a high quality development where open space is integrated through the scheme which will enable dwellinghouses to be spread out in a more organic manner through the site and to deliver a high quality environment for future residents. This is poor place making and we would ask that flexibility is provided to arrange the dwellinghouses throughout the site and to locate SANG and open space elements in the most appropriate locations where existing landscape features or interest can be best preserved or enhanced.

The expectation that approximately 50% of the land parcel be delivered as SANG when both of the other proposed allocations are proposed to deliver the same or more dwellinghouses than Land South of Blackwater Grove, but with no obligation to meet any of their own SANG needs, is unreasonable. The other two development sites would be reliant upon off-site SANG. This is inconsistent and would result in the inefficient use of a site which is better positioned and poised to deliver housing growth given its location and scale.

Having regard for the size of the Highwood SANG north of Alderholt, where Natural England indicated that the SANG land parcel based on its size could meet the mitigation requirements for approximately 82 dwellings (at the time of Application ref. 3/20/1732/FUL which secured the delivery of the SANG) (NE consultee response appended to this letter at **AB1**), it is considered that the Land at Blackwater Grove is more than capable of being brought forwards for its deemed 50 homes capacity with its own site specific SANG within the scope of its the 3.6ha site area.

Whilst we strongly support the ANP's general spatial strategy, and the inclusion of Land South of Blackwater Grove as a site allocation for housing development, we do object to the suppressed level of housing growth that is proposed for the site having regard for the size of the land parcel, its ability to provide its own site specific SANG, and in terms of its proximity to existing services and facilities and existing public footway connections. It is also noted that the landowner controls a section of land to deliver a new footway link towards Ringwood Road, and the existing footways along Blackwater Grove are well sized and more than capable of supporting the development.

As previously discussed, we consider that the proposed Policy 14 should be reworded as follows; with the amendments shown principally in bold:

Policy 14. Land South of Blackwater Grove

*Land south of Blackwater Grove (as shown on Map 10), is allocated for **about 40-50 dwellings and accessible greenspace.***

New dwellings should be focussed towards the eastern end of the site; within the area south of Blackwater Close and 9 Blackwater Grove, but this should not prejudice the delivery of an alternative arrangement which best responds to the specific site constraints. Development should avoid areas at potential risk from groundwater flooding (a comprehensive flood risk assessment will be required to inform the planning application). The design, mix and layout should be in line with Policies 1 – 7, and should respect the amenity of adjoining residential properties.

Vehicular access to the site will be from Blackwater Close. The existing pedestrian access from Ringwood Road should be improved. ***The development should not prevent the formation of future connections to 9 Blackwater Grove and land to the south in line with Policy 2.***

*Landscaping will be required along the site boundaries with adjoining countryside and should reinforce the tree clump on the southwestern corner of the site. **The development will be required to secure an appropriate Sustainable Alternative Natural Greenspace (SANG) to mitigate for the recreational impacts of the new dwellinghouses upon the nearby Dorset Heathlands protected designation. This heathland infrastructure project should be made available prior to occupation of the dwellings.*** A combined landscaping, biodiversity and drainage layout plan will be required to demonstrate how the development considers these issues comprehensively.

The Highwood SANG and Alderholt Surplus Stores HIP

The ANP identifies at Paragraph 4.1.12 the presence of both a Strategic Alternative Natural Greenspace (SANG); The Highwood SANG, and a Heathland Infrastructure Project (HIP), The Alderholt Surplus Stores HIP, which are currently available within or adjoining Alderholt and capable of mitigating the impact of recreational activity arising from new housing development within the Neighbourhood Plan Period upon the designated site of the Dorset Heathlands at Cranborne Common SSSI and indeed those other designated sites within 5km of the settlement, alongside Strategic Access, Management and Monitoring (SAMM) contributions which would be secured from any development.

The ANP also proposes an additional HIP or SANG on Land south of Blackwater Grove, as discussed above, which is more than capable of meeting the needs of the development of this site in isolation without reliance upon either the Highwood SANG

or Alderholt Surplus Stores HIP to enable its delivery. The point being that, on the basis of the existence of these existing resources, which themselves have residual capacity remaining which is capable of supporting additional residential development in Alderholt, a reduced quantum of SANG/HIP could be delivered on Land South of Blackwater Grove in favour of a greater quantum of residential development.

Indeed, as reflected within the Habitats Regulations Assessment (HRA) accompanying the ANP and as stated at Paragraph 4.2.12 of the ANP, the Highwood SANG has residual capacity; *“for a further 38 homes”*.

We understand however that this represents a minimum figure and indeed that the Highwood SANG is potentially capable of providing further mitigation for additional homes.

It is also understood that there are no positive obligations in place, as a result of the Legal Agreement that accompanied the SANG application (ref. 3/20/1732/FUL), that would enable the Landowner to actively assign any such credits to third parties and indeed there would be no incentive for the landowner to do this on a piecemeal basis. The residual capacity in the Highwood SANG would best enable additional development needs to be delivered through the allocation of additional housing development specifically within the scope of the ANP rather than relying on future windfall delivery.

As we have set out, Site 009: Land South of Blackwater Grove, is more than capable of delivering additional growth in this respect.

Additional Technical Work – Land South of Blackwater Grove

Following engagement with the NPWG at Alderholt Parish Council we have instructed and undertaken further technical work in respect of Site 009: Land South of Blackwater Grove, to provide further comfort for the Independent Inspector with respect to the capacity of the land and its ability to support a greater level of housing growth as we have proposed.

An indicative Layout has been prepared which demonstrates how a scheme of 40 units could be arranged on the land and how an appropriate provision of SANG and Public Open Space (POS) could be arranged within the site to address the policy requirements of the Local Development Plan and having regard for the Development Management Policies of the ANP.

The layout prepared by Brightspace Architects and titled – *‘Land South of Blackwater Grove Indicative Scheme - 40 Units’* is enclosed alongside this representation as appendix to the two technical reports discussed below.

The additional technical work carried out alongside this assessment is based upon a scheme of between 40 and 50 units and thus includes appropriate sensitivity testing for a scheme of increased density to demonstrate that the development could be

technically delivered on the ground in view of the existing and emerging Local Planning Policy (including the ANP) and National Planning Policy.

Flood Risk Assessment (FRA) and Drainage Strategy (DS) Scoping Report

The FRA and DS Scoping Report prepared by SLR Consultants provides a detailed overview of the hydrological context of the site.

The technical report confirms that the site is located within fluvial Flood Zone 1, being at the lowest risk of flooding each calendar year; defined as *'less than 1 in 1,000 chance of flooding each year'*.

It is also confirmed that the site is not subject to any surface water flood risk. in terms of categorisation this comprises *'very low risk, with a less than 1 in 1,000 chance of flooding each year'*.

With respect to groundwater flood risk it is confirmed that the underlying geology of the site comprises a *'Parkstone Sand Member and River Terrace Deposits'*, which is classified as a *Secondary A Aquifer* and represents a local source of groundwater. It is unlikely, having regard for this underlying geology that there is any significant source of groundwater flood risk and moreover, the hilltop location of the site renders it further unlikely to be subject to groundwater flood risk.

Engagement has been had with the local Statutory Undertaker, Wessex Water in relation to the capacity of their network to accommodate the proposed development.

Opportunities exist to connect to the public surface water sewer and the public foul water sewer. Pursuant to the initial engagement undertaken with Wessex Water, evidence is included within the Scoping Report at *'Appendix B'* of agreement from the Statutory Undertaker to form connection to both public sewers, with sufficient capacity existing to cater for the development. This has been sensitivity tested for a scheme of up to 50 units at this stage; far exceeding what is set out within the proposed Policy 14 for the site at 15-20 units, but better reflecting the development opportunity of the land, bearing in mind its ability to deliver a self-contained SANG and indeed developing the site out at an appropriate density as we have discussed above.

Transport Statement Scoping Report

The Transport Statement Scoping Report (TS) prepared by SLR Consultants provides a detailed overview of the relationship of the site with the existing adopted highway network and considers the impact of the development of Land South of Blackwater Grove, sensitivity tested for a development proposal of up to 50 units.

The TS confirms that, having regard for the direction of Manual for Streets (MfS), *for a development of 50 dwellings, a 5.5m carriageway plus 2m footway on each side, and/or 1.0m margin on one side, would generally be considered suitable.*

The TS considers the existing access serving the site from Blackwater Close, and comments as follows on its status, condition and the ability for the highway to be

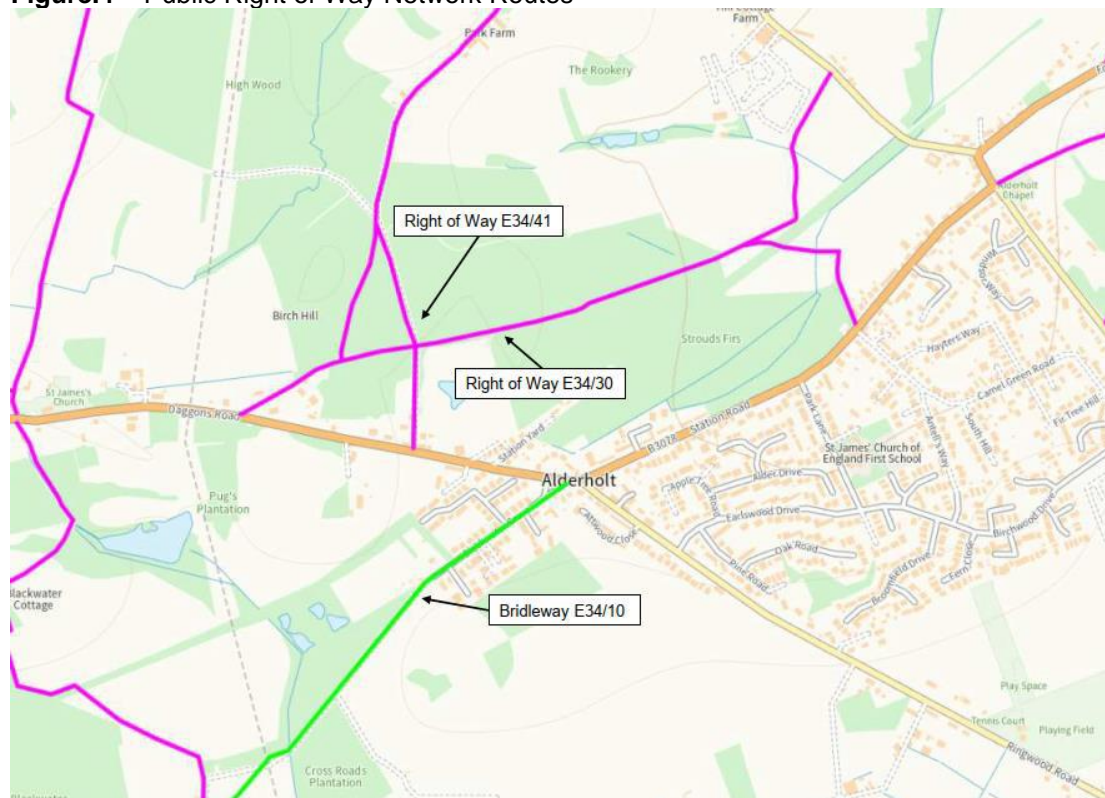
upgraded to meet with the expectations of MfS and thus to accommodate the proposed development:

Blackwater Close would provide the primary access point for the proposed development site and connects the site with Blackwater Grove approximately 80m to the north. It is currently a no-through road that provides access to 8 existing dwellings. There is an existing field gate providing access to the site at the southern end of Blackwater Close. The existing road is constructed to modern standards and has an approximate width of 5.5m with 2m footways on each side. To its southern extent, the road takes the form of a private drive with a shared-surface, where pedestrians / cyclists share the road with vehicles on a conciliatory level. There are 2m verges to either side of the private drive, allowing the potential for continuous pedestrian footways to be provided to the site boundary.

Beyond the site, it is confirmed that Blackwater Grove itself, from which Blackwater Close is serviced, comprises a two-way residential cul-de-sac constructed to modern standards with appropriate highway furniture and subject to a 30mpoh speed limit with sufficient visibility existing at both the Blackwater Close junction on to Blackwater Grove and indeed from Blackwater Grove onto the B3078 Station Road. In this respect the access to serve the site is safe and operates well within its designed capacity.

The TS confirms that Land South of Blackwater Grove is well connected to the local Public Right of Way Network, with Blackwater Grove itself forming per of the Bridleway E34/10 which provides a direct route between Alderholt and Verwood settlements. The PRow network is shown below in excerpt at **Figure.4**.

Figure.4 – Public Right of Way Network Routes



As the TS confirms at Paragraphs 4.8-4.10, an initial Highway Drawing ref. **422.065054.00000-PD02** has been prepared and is appended to the TS within the 'Drawings Appendix'. Having regard for the details set out within this detailed drawing, it is considered that Blackwater Close could be improved to an appropriate standard to form the main vehicular access for the development and would comprise a suitable access for up to 50 dwellings. It is moreover noted that there is an opportunity for a new pedestrian route from the site to Ringwood Road having regard for the strip of land within our client's control which was retained for such purposes. The land within the control of Commercial Freeholds Limited is identified at **Figure.5** below for the Independent Examiner's reference.

Figure.4 – Land Ownership Plan – Commercial Freeholds Limited



A TRICS assessment has been undertaken and forms part of the TS. This confirms at **Table 5.6**; as cited below, that the resulting impact upon the highway network arising from the development of Land South of Blackwater Grove with a scheme of up to 50 dwellinghouses, would be at most a 3% increase in traffic during peak hours, with the majority of movement anticipated to travel east along the B3078 Station Road towards Fordingbridge, and a much lower distribution of movements travelling west towards Verwood.

The impact upon the public highway network resulting from this level of traffic increase would be minimal and therefore in this regard would not result in any adverse impact upon the highway network were Land South of Blackwater Grove to be brought forward

for an increased level of housing development above that proposed within Policy 14 of 15-20 units.

Table 5.6: Proportional Development Impact on the B3078

Time Period	Impact on the B3078	
	East of Blackwater Grove	West of Blackwater Grove
08:00-09:00	3%	1%
17:00-18:00	3%	1%

We have demonstrated through appropriate technical work, that were the Independent Inspector to consider that the amendment to Policy 14 as we have proposed should be made, this change can be accommodated without any conflict with Local or National Policy or detriment to local character and amenity.

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Conclusion

We commend the hard work of the Alderholt Parish Council and the Neighbourhood Plan Working Group in relation to their preparation of the Alderholt Neighbourhood Plan. We strongly support the Alderholt Neighbourhood Plan in relation to its approach to the allocation of three development sites to see the delivery of housing to meet an appropriate and proportional share of the needs of the East Dorset sub-district.

We do raise issue with the manner in which several of the policies have been drafted and specifically in relation to the proposed policy approach for Land South of Blackwater Grove, which we believe is being unreasonably restricted in terms of its development capacity having regard for the size of the site and its relationship with the existing built area of the settlement in comparison to the two other proposed site allocations, and moreover in a manner which does not properly reflect the direction of National Policy.

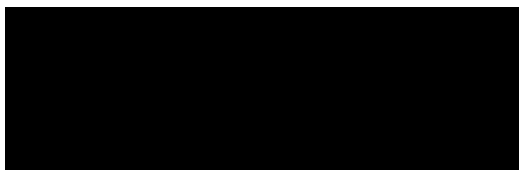
We consider that appropriate amendments to the wording of the proposed Site Policy 14 – Land South of Blackwater Grove, could be made, and these would render the Neighbourhood Plan sound. We have also suggested amendments to development management Policy 7 – Meeting Local Needs – Housing, in respect of its particular wording and the implications for the housing mix of any future development.

We have suggested alternative policy wording where required and, in this regard, consider that, subject to appropriate changes being made, the Neighbourhood Plan should be supported by the Independent Examiner.

Should there be any queries in respect of our representations, or our client's land interest, please don't hesitate to contact me directly.

We ask to be kept updated with respect to the progress of the Alderholt Neighbourhood Plan as it proceeds through examination and to Local Referendum.

Yours sincerely



Adam Bennett BA (Hons) MRTPI
Senior Associate Planning Consultant

Direct email: 

Website: www.kenparkeplanning.com

Encl.

Land South of Blackwater Grove Indicative Scheme - 40 Units
Flood Risk Assessment and Drainage Strategy Scoping Note - 416.065494.00001_V2
Transport Statement Scoping Note 422.065054.00001-V1

Note that the enclosed documents referred to above can be downloaded from <https://www.dorsetcouncil.gov.uk/w/alderholt-neighbourhood-plan>

Representation number: 32

From: Philip Reese, Senior Planning Policy Officer

Organisation: Dorset Council

Submitted: 25 June 2024

Comments:-

Dorset Council welcomes progress of the Alderholt neighbourhood plan and supports its vision and objectives. We have commented on earlier versions, including the Regulation 14 version (as evidenced by the submitted Consultation Report), and are pleased to see that many of our comments have been taken on board. We hope that these latest comments will help to finalise the plan ready for referendum.

Section / paragraph	Comments
Para 1.3.8	<p>Comments from DC's Lead Local Flood Authority Team</p> <p>The text in this refers to the future publication of the SFRA. However, it has now been published.</p> <p>(Note, the Level 1 SFRA was published in March, and is available at https://www.dorsetcouncil.gov.uk/w/dorset-council-level-1-sfra)</p>
Map 3 on Page 12	<p>Repeating comments that we made at Reg 14, the hatching on this map makes it difficult to identify streets on the base map, and therefore it's very difficult to establish where one area finishes and another starts. It would be useful if the areas weren't hatched or at least not hatched so heavily. Policy 1 refers to the character areas on this map, and therefore it could have implications for successful policy implementation (NPPF para 16d requires policies to be clearly written and unambiguous). It might also be possible to use hatching that can be reproduced in black and white – for example using horizontal stripes for one area and vertical stripes for another.</p>
Policy 1	<p>Noted and supported – although see comments above regarding making Map 3 clearer.</p>
Policy 2	<p>Noted and supported</p>
Policy 3	<p>Noted and supported.</p>
Para 3.4.4	<p>While I appreciate this paragraph has been amended following my comments on the Reg 14 version, for clarity it's possible it requires a further tweak. The first sentence refers to “meter boxes and solar panels” and then the second sentence refers to “solar panels and air source heat pumps”. My suggestion is that reference to solar panels should be deleted from the first sentence.</p>
Policy 4	<p>Noted and supported.</p>
Policy 5	<p>Noted and supported.</p>

Section / paragraph	Comments
Policy 6	Noted and supported.
Para 4.1.6	Since the Reg 14 version, additional text has been added to the end of the last sentence, which states that affordable housing “should be of poor quality in terms of their general appearance and location from open market housing”. I’m assuming that the opposite is actually meant, and that this is rather unfortunate drafting.
Policy 7	Noted and supported.
Policy 8	<p>Policy noted. The requirement for new buildings to be readily convertible to retail or other non-residential uses seems to be quite unusual, particularly within such a large area in a village. As such, we’re unsure how this policy will be implemented in practice (assuming that suitable infill opportunities come forward). Likewise, the requirement for “suitable provision for customer parking” could be particularly challenging since many infill opportunities are likely to involve the subdivision of plots, and therefore may be limited for space.</p> <p>Such a policy might be justified if it might result in the creation or strengthening of a ‘town centre’. However, the length of the ‘High Street’ (as shown on Map 10) is approximately 1.5km. Along the length, there is scattering of commercial properties. As such, the justification for this policy seems limited. Given the difficulties outlined above regarding implementing this policy, we feel unable to support it.</p>
Policy 9	<p>Noted and supported.</p> <p>The Dorset Council Local Plan, Options Consultation 2021 included a draft policy (ALD2), which stated: “Dorset Council will work with Hampshire County Council to investigate the feasibility of establishing a railway between Fordingbridge and Alderholt using as much of the former Salisbury to Poole railway line as possible.” Policy 9 appears to be consistent with this emerging LP policy.</p>
Policy 10	Noted and supported.
Policy 11	Noted and supported.
Policy 12	Noted and supported.
Policy 13	<p>Noted and generally supported.</p> <p>Para 4.2.15 notes that this site forms a visual entrance to the village. We therefore question whether requiring employment areas to front the ‘High Street’ is appropriate, bearing in mind that this could include workshop type buildings, similar to the neighbouring garage. For visual amenity reasons, it might be better to locate such uses to the rear of the site. We note that the agent for this site (Nova</p>

Section / paragraph	Comments
	Planning) makes a similar point, arguing for greater flexibility.
Para 4.2.20	There is no address registered as “9 Blackwater Close”. I think this should refer to the land to the rear of “9 Blackwater Grove” – which is the address referred to in paragraph 4.2.22 and Policy 14.
Policy 14	Noted and supported.
Policies 11, 12, 13, and 14	<p>Comments from DC’s Conservation Team</p> <p>The additional, proposed site allocations have been assessed, in relation to perceived impacts on encompassing heritage assets, considered of special architectural/ historical significance and their associated settings. Predicate on the extents identified on the supporting indicative plan, Map 10, we can confirm a conclusion of no concern.</p>
Policy 15	Noted and supported.
Policy 16	Noted and supported. DC’s property and assets team have been informed of the intention to designate sites owned by DC as LGS, and have not raised any objection.
Policy 17	Noted and supported.
Policy 18	Noted and supported.
Policy 19	Noted and supported.
Page 69, LGS12	Typo “tuns through the site” -> “runs through the site”
Other	<p>Comments from DC’s Transport Planning Team</p> <p>We have reviewed the latest version of the Alderholt Neighbourhood Plan and have no further comments. Our previous comments from the Reg 14 consultation have been included within this latest draft.</p>