

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 78 APPEAL

BY

Dudsbury Homes (Southern)

LAND SOUTH OF Ringwood Road

Alderholt

DORSET

REBUTTAL EVIDENCE OF

Ursula Fay

BSc (Hons), MSc, MRTPI

ON BEHALF

OF

DORSET COUNCIL

Planning Inspectorate Reference: APP/D1265/W/23/3336518

Local Planning Authority Reference: P/OUT/2023/01166

Produced 14 June 2024

1. Introduction

- 1.1. This rebuttal relates to Urban Design and should be read in conjunction with my Planning Proof of Evidence Annex A (UFPoEA) (CDG1).
- 1.2. The Appellant has introduced new evidence through Gary Worsfield's PoE (GWPoE) (CDG16) that was not previously seen by the Local Planning Authority (LPA). This rebuttal provides a response and additional evidence to aid the Inspector.

2. Appellant's Design Explanation

- 2.1. During the course of the planning application, the Appellant provided a design explanation regarding the position of the Local Centre, as explained at para 7.3 of UFPoEA. A table at 7.4 provides a critique of the design explanation at that time.
- 2.2. A revised design explanation is included within GWPoE, summarised within the table on page 60. This table compares the 'existing Co-op and hub' (Co-op), the Local Centre setting as proposed' (PLC), and an 'alternative northern location' (ANL).
- 2.3. The first concern raised, is that there is no map or plan identifying the location of the ANL. As such it is impossible to ascertain where the ANL is situated, and whether it is comparable to the 'alternative local centre' (ALC) as identified at Fig 7 of UFPoEA. There is no detailed analysis of the ANL to inform or support the conclusions reached on page 60.
- 2.4. There is also a lack of clarity around some of the identified Conditions against which the three locations are assessed. It is unclear why some of these Conditions are desirable and/or how the evidence demonstrates the conclusions reached. The following considers each Condition suggested as relevant by the Appellant, along with a critique of the approach and conclusions reached. Where comparisons are made these relates to the ALC, as the precise location of the ANL is unknown.

Proximity to existing school

- 2.5. The Council's position is that a new 2FE first school should be provided and accommodated on the development site, as set out in Ed Denham's PoE (CDG7). It is agreed that proximity to the school (on- or off-site) is desirable.
- 2.6. In terms of this proximity, all locations are scored positively by the Appellant. However, no evidence supports this position, such as wayfinding maps or a table of walking distances. The following table provides walking distances for the existing Co-op hub, PLC and ALC (as the location of the ANL is unknown). This demonstrates that the Co-op and ALC are well

within a 10-minute walk (800m), while the PLC is further away. These distances demonstrate that the PLC is not in close proximity to the school.

Location	Approx. walking distance to St James First School
Co-op hub	600m
PLC	950m
ALC	675m

Viability of both Co-op and new centre existing together

- 2.7. There is no explanation of this Condition and it is unclear what evidence sits behind it. The submitted RISTA has shown that there is expected to be an impact on the existing Co-op arising from a new convenience store in the development, as detailed in Christine Reeves’s evidence. However, no evidence has been submitted to demonstrate that the impacts on the Co-op would be dependant on the positioning of the local centre within the development. There is no evidence regarding the relevance of this Condition.

Proximity to sheltered accommodation / care home, promoting intergenerational exchange and social interaction

- 2.8. Those living in sheltered or extra-care accommodation can be less mobile, and so benefit from improved accessibility to shops and facilities. The relationship between the local centre and proposed extra-care accommodation is important. The Appellant does not specify however it is assumed that the reference is to care accommodation proposed within the site.
- 2.9. The parameter plans do not specify a location for the care accommodation, with this assumed to be within the areas identified as ‘homes/neighbourhood’. As such there is little to constrain the positioning of care accommodation within the site. No explanation has been provided to support the case put forward that the ALC could not meet this Condition.

Balanced and optimal coverage of infrastructure and services across the whole territory

- 2.10. Throughout the application and appeal process the Appellant has referenced the provision of a new centre which will provide ‘a heart’ (as referenced in the Design and Access Statement (DAS) (CDA49)) or ‘a hub’ where people can meet and access services, both the existing and new residents of Alderholt.

- 2.11. However, GWPoE specifically states the PLC is not 'a heart'. Para 4.5 states:
'To consider it as a singularity, detaches its abilities and combination with a whole matrix of heartlands that unite and sit collectively, toward a truly sustainable place that has widespread community creation and facility in its DNA.'
- 2.12. It is understood this that the intention is the PLC is one of several 'hubs' across the development site, and that these link with each other and with existing hubs in Alderholt to create connected journeys.
- 2.13. However, it is the proposal of the Appellant that they group the local centre facilities together. In so doing they are creating the largest 'hub' that will be present within the village. It makes sense that this hub be located as centrally as possible, with smaller hubs such as play areas or open spaces distributed across the development.

Community integration and strengthening by encouraging travel through the new development and experiencing the character, subsequent neighbourhoods, social hub / facilities on the way

- 2.14. Community integration is crucial to success of any new neighbourhood, and would be particularly so for a proposal such as this one where an existing village is doubled in size. There is a risk of creating a community divided between old and new.
- 2.15. It is unclear how locating the PLC in a location significantly more accessible to new residents than existing will aid in community cohesion. Particularly given the Appellant's belief that this will include service to improve facilities for all such as small retail units and a health care centre. If anything, this is likely to lead to resentment amongst existing residents regarding the relative inaccessibility.
- 2.16. The benefit of encouraging travel through the new development is also unclear, is the Appellant suggesting they have purposefully extended journey times?
- 2.17. It is also unclear on what basis the ANL/AMP is expected to prevent community cohesion, as GWPoE does not provide any evidence to support this.

Proximity to the employment area, strengthening its viability and pedestrian / cycle connections to and from

- 2.18. The first concern arising from this Condition is the assumption that employment uses must be placed adjacent to the Hillbury Road roundabout. As agreed at para. 2.13 of the Local Centre / Retail Topic Paper (CDG38) (LC/RTP), the uses as such that can be carried out within a residential area. Similarly to the care accommodation, there is no restriction on

their placement, save the submitted Land Use Parameter Plan (LUPP) (CDA11). As such, reliance upon these uses to constrain the location of the local centre is illogical.

- 2.19. Additionally, the Council is not concerned about the viability of the employment uses. Similar small business parks have been successfully developed within the rural areas of East Dorset and they are not reliant upon proximity to local services to ensure viability.

Promoting travel through recreation grounds, rather than along the road, for the majority of existing Alderholt households

- 2.20. Again, it is unclear what urban design principles are behind the identification of this Condition. While it is desirable that pedestrians have the option to walk through open spaces, this should not be a substitute for legible, safe and secure streets.
- 2.21. The existing path across the recreation ground is not a public right of way, although access is permitted. The Addendum to the Transport Assessment (TAA) (CDA99) assesses this (para. 3.9), identifying that it varies in width being 1m at its narrowest, and is occasionally lit. There is no natural surveillance and none is proposed arising from this development.
- 2.22. While this route may be attractive during daylight hours, it is less likely to be so during dark evenings. As well as being only occasionally lit, it has no natural surveillance from adjacent buildings. Similar considerations are likely to apply to the other route proposed across the recreation ground extension.

Journey to the local centre introduces various stop points on the way, enhanced with opportunities for POS, amenity, benches, encouraging social interaction. A holistic place.

- 2.23. Regarding this Condition, while the sentiment behind the idea of wayfinding and connected places is understood, the Appellant's application and assessment are not. The Appellant considers that the PLC meets this Condition while the ALC does not.
- 2.24. Evidence has been submitted (GWPoE App. 23) in the form of walking routes to the PLC with dots identified at 1 minute intervals. This shows a range of experiences within the proposed development such as open spaces and play areas. It does not include all such uses within the existing village.
- 2.25. However, the main concern is that it does not demonstrate that the PLC is the only location which can connect to these places. As such it is unclear on what basis the Appellant has assessed the ALC as unable to meet this Condition.
- 2.26. Many of these elements e.g. the details of open spaces, benches etc. fall to be considered and incorporated at a more detailed stage of the design, unless there is a clear reason why

this would not be possible. There is no clear reason in this case and so I do not consider this Condition is of relevance at this stage of the design iteration.

A natural node sitting on the intersection of all main transport links with ease of connection to all principle facilities

- 2.27. It is unclear what definition is being used here for a 'node'. Kevin Lynch's seminal work 'The Image of the City' (1960) describes a node as '*a strategic spot... places of a break in transportation, a crossing or convergence, moments of shift*'. The PLC location does not fit within this definition. As demonstrated in UFPoEA, the PLC is poorly located in relation to the strategic route network. It is not, therefore, a strategic spot. Further, streets do not converge there, it is not a crossing or a natural break in transportation.
- 2.28. It is also unclear on what basis the Co-op hub, which is positioned at the junction between two strategic routes, is assessed against this Condition as 'N/A'.
- 2.29. The ALC is placed at the point of diversion into the site from Ringwood Road – as such it is at a place where there is a convergence of routes. As explained in UFPoEA, it is not as strategically located as the Co-op but is more strategic than the PCL.
- 2.30. Given that the majority of 'principle facilities' within Alderholt following this development would be within the local centre (with the notable exception of the school) it is unclear what relevance this has as a Condition.

Missing Conditions

- 2.31. There are some key considerations that are missing from the assessment. Matters considered fundamentally important to the success of the proposal are:
- viability of the local centre
 - implications of phasing
- 2.32. These are considered within the UFPoEA.

Updated assessment

2.33. The following table summarises my assessment of updated Conditions, based on those suggested in GWPoE, and their application to the three locations.

Context/Condition	Existing Co-op and hub	PLC	ALC
Relationship with existing school	✓	✗	✓
Viability of both Co-op and new centre existing together	No evidence this is relevant		
Proximity to sheltered accommodation / care home	-	✓	✓
Principle community 'hub', as part of a network of hubs across the existing and proposed village	✓	✗	✓
Community integration and strengthening	-	✗	✓
Relationship with employment area	-	✓	✓
Promoting travel through recreation grounds, rather than along the road, for the majority of existing Alderholt households	Not considered desirable		
Journey to the local centre introduces various stop points on the way, enhanced with opportunities for POS, amenity, benches, encouraging social interaction. A holistic place.	Not of strategic importance at this stage of the design process		
A natural node sitting at an intersection of main transport links	✓	✗	-