



Mike Garrity
Head of Planning
Dorset Council
County Hall, Colliton Park
Dorchester
DT1 1XJ

4 July 2023

Dear Mike,

Land to the south of Ringwood Road, Alderholt P/OUT/2023/01166

I would like to address a few additional points regarding your recent email and the Officer's report in relation to our planning application for Alderholt Meadows. It is crucial that I provide a comprehensive response as there are some inaccuracies that need correcting.

Sustaining Alderholt as a Rural Service Centre

Dudsbury Homes is proposing sustainable growth that reinforces Alderholt's role as a Rural Service Centre as envisaged within the Council's own 2014 Core Strategy (Policy KS2) where

'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.'

The Council acknowledge that Alderholt as a designated Rural Service Centre is failing. We are therefore proposing not only to address the concerns raised by Dorset Council regarding the location's perceived unsustainability but also meeting the NPPF tests for sustainability (NPPF section 2, p5).

Our aim is to fix the problem and meet the requirements of the Core Strategy by delivering exactly what Alderholt is designated to be, a place with services and facilities supporting surrounding rural communities. The Core Strategy does not say what level of growth is required, but to sustain Alderholt's position in the settlement hierarchy the level of growth needs to be of a scale capable of delivering such services and facilities. Thereby, far from conflicting with the local plan our proposal aligns with the Plan's policy objective for Alderholt. I believe that your committee report fails to grasp this key point which is a fundamental matter in the decision-making process.

The Conflict with the Council's Position and NPPF Guidance:

In your email of the 15th May, you stated that the council's position is that where applicants do not engage in pre-application advice, applications are likely to be determined as submitted within the statutory timeframe. I would like to draw your attention to paragraph 40 of the National Planning Policy Framework (NPPF), which acknowledges that local planning authorities have a key role in encouraging other parties to take maximum advantage of the pre-application stage. While they cannot require developers to engage with them before submitting a planning application, they should encourage the uptake of any pre-application services they offer. It is important to note that we have been engaging with the council since 2018, and it was only due to conflicting comments during our meetings with the policy team that we decided to submit the application. We have always sought to be reasonable and have continually engaged with the council. This discrepancy raises concerns about the fair and consistent application of policies and procedures.

Furthermore, in your committee report, paragraph 16.4, it states that regard has been given to whether it would be appropriate to agree to an extension of time to enable additional negotiations. It is important to note that we have requested additional time on three separate occasions, but our requests have been denied. This raises questions about the opportunity for meaningful engagement and the ability to address outstanding issues adequately.

I also find it odd that while informing us of your position of non-negotiation, we were provided with a list of questions where additional information was sought to help aid the decision-making process. Surely, having opened the door to negotiation, slamming it closed without recourse to further response contradicts your own internal policy position. Even where we have continued to engage with consultees and resolve issues, these will not be presented to members in any form of an update. Therefore, despite this, members will be none the wiser that one of the reasons for refusal has been agreed and does not need to form a reason for refusal.

It is noted that in the report that paragraph 12 of the NPPF is referenced, but the context of this paragraph, which includes the condition where a council has an up-to-date plan, has been omitted. It is essential to consider the NPPF in its entirety and not selectively quote individual paragraphs that may distort its intended meaning.

I am also bemused by paragraph 16.537 towards the end of the report where it concludes that many of the reasons for refusal could be overcome if further technical information were to be submitted but, even if this information were to overcome the issues it still would not be sufficient to overcome an objection to the principal of development. This point confirms my view that entering into formal pre-application discussions would have been fruitless and only told us how to get a recommendation for refusal. However, even more concerning is that the report presents a hypothetical view on a planning balance argument on any subsequent future application. Any planning balance exercise can only be undertaken based on the information available at a point in time and for the application that it relates to. This comment only serves to pre-determine such a situation in an unfair and partial way.



Given the concerns raised regarding the conflict between the council's position and the NPPF guidance, as well as the limited opportunity for meaningful engagement, I kindly request that either the committee be updated with our concerns or that the item be withdrawn from the agenda. This would allow us the proper time to engage in open discussions, provide additional information, and address any outstanding issues as envisaged in the NPPF.

I appreciate your attention to these matters and the evaluation of our proposal. I firmly believe that our sustainable development aligns with the principles of the NPPF and the Christchurch and East Dorset Core Strategy and that it will bring significant benefits to the local community. It is our sincere hope that our concerns will be duly considered, ensuring a fair and unbiased assessment of our proposal.

Thank you for your understanding and cooperation.

Yours sincerely,



Mark Hewett
Director, Dudsbury Homes