

Action for Alderholt - Statement of Case as Rule 6 party

Statement Submitted on 27 March 2024

Appeal Reference APP/D1265/W/23/3336518

LPA reference P/OUT/2023/01166

Inquiry to be held 25 June 2024 in relation to:

Land To The South Of Ringwood Road, Alderholt

1 Background

1.1 Dudsbury Homes has appealed against the refusal of their planning application for 1700 homes. Action for Alderholt is an association of people living in and around Alderholt and a "Rule 6 party" for the appeal. We are working with Dorset Council and Alderholt Parish Council to avoid duplication of evidence.

1.2 Having considered the appellant's Statement of Case we note that they intend to submit a great deal of further evidence. Once this is available it is likely there will be further matters requiring clarification.

2 Statement of case

Action for Alderholt is in favour of sustainable development within our village. To that end we have worked with the Parish Council over several years to produce a draft Neighbourhood Plan. We are making this submission because we believe that the Alderholt Meadows proposal will not meet local needs, will not produce sustainable development and is based on a false prospectus. The major problems with the proposal are:

2.1 It claims to improve the self-containment of the settlement but provides no compelling evidence that this will be achieved in practice. Our work indicates it is more likely to reduce self-containment. This undermines transport and environmental assessments which are already over-optimistic.

2.2 Alderholt is the wrong place for development of this scale because it lacks adequate transport links, employment and services to sustain it. The application does not include sufficient interventions to mitigate this. It provides inadequate detail about how these interventions will be delivered.

2.3 The suggestion that development on this scale is necessary to achieve improved self-containment is not supported by evidence.

2.4 The proposed timescale for development is uncertain and it is doubtful when any contribution to local housing supply would be achieved. The Letwin report to government in 2018 showed that for schemes of over 1,500 units in areas of high housing demand, build rates average between 6% and 3% per annum. Alderholt has not proved to be an area of high demand, existing planning approvals have yet to be delivered (see note 1) so delivery of this scheme could take 30 years or more. It is

questionable whether the evidence submitted suggesting that homes would be delivered within 5 years would meet the NPPF and planning policies guidance definition of 'deliverable.'

2.5 This timescale introduces huge uncertainty into the provision of extra services and facilities proposed by the applicant. For example, when might it become feasible to make substantial investment in expanding schools and changing education from a 3-tier system to 2-tier? When might extra shops and hospitality businesses become viable? How long would a bus subsidy be needed?

2.6 The viability assessment appears to make insufficient provision for timescale, infrastructure and finance cost risks.

2.7 The appellant's suggestion that so many fundamental issues with the outline application could be dealt by means of a conditional approval is not acceptable for a scheme of this size. The detailed work needed to meet these conditions could further undermine the viability of the scheme. S106 contributions need to be calculated based on an agreed transport assessment to assess both transport and environmental impacts. There are fundamental disagreements about transport study methodology.

2.8 We believe the application was submitted without sufficient evidence to allow the planning authority to grant approval - irrespective of the merits of the proposal. The appellant stated openly that they intended to seek approval via appeal even before the application was considered. They are now attempting to evolve the scheme during the appeal. This is an abuse of process and leads to a waste of public funds, both by the Planning Inspectorate and by the public bodies defending the appeal. We therefore believe that the appeal should be dismissed and costs should be awarded against the appellant.

The appellant's Statement of Case does not address these fundamental defects.

2.9 Action4Alderholt is broadly in agreement with the Statement of Case from Dorset Council. As a local community group we will respond to further information submitted by the appellant and put forward evidence from the local community regarding:

- Services within the village and surrounding areas, and how they would be affected by the scheme
- The local experience of travel, employment, education, services and recreational opportunities

3 Planning context

3.1 The appellant's case relies upon the the presumption in favour of sustainable development in the NPPF. However paragraph 188 makes clear this does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans

or projects). This application clearly has a significant effect on the Avon Valley RAMSAR site, New Forest National Park, Dorset Heathlands and Cranborne Chase AONB. Whilst some of these effects can be mitigated by financial contributions or credits, there is no evidence that they can be rendered insignificant. This applies particularly because of the following factors.

3.2 The transport study only models the most optimistic scenario; the probability is that traffic generation will be substantially greater.

3.3 The cumulative effects of developments in Fordingbridge and mineral extraction around Midgham Farm (part of the emerging Hampshire Minerals Plan) have not been taken into account.

3.4 The timescales for Alderholt Meadows and potential mineral extraction at Midgham Farm extend for several decades, during which heavy vehicles will compete with other traffic for road space - inevitably traffic will be displaced to less sustainable routes such as the B3078 through the New Forest.

3.5 The cumulative effects of factors reducing self-containment for Alderholt and Fordingbridge and surrounding areas are also significant. For example, approved housing growth in Fordingbridge, Ringwood and Verwood is already exceeding the capacity to create more local employment (see note 2) generating more journeys to work through habitats sites.

3.6 Hampshire County Council's proposal to close Somerley waste recycling centre would mean local people needing to drive to Wimborne for recycling, generating more traffic through the AONB.

3.7 Transitional impacts during the development are not fully assessed. In addition to construction and associated traffic these include the reduced self-containment when early phases of housing are occupied but before improved services become available. These impacts are most significant for such a large, long-term scheme because external factors could halt development. For example, the last two decades have seen the banking crisis, the Covid pandemic and periods during which labour and/or building materials were in short supply.

3.8 The UK must achieve "net zero" by 2050 which is only possible with sustainable land use planning and transport policies. We believe that this must be given weight when interpreting the NPPF. Large scale housing developments need access to services, education and employment without excessive travel, or with good access to alternative modes of travel. The location of Alderholt means that people here travel relatively long distances for work, education and access to services. They also travel in all directions, making the provision of alternative modes of transport unusually difficult. If approved, Alderholt Meadows could still be under construction in 2050. It should not be approved unless a much more self-contained settlement can be guaranteed.

4 Excessive conditionality

It is not yet clear what conditions could be negotiated to balance the dis-benefits of the scheme but a number of those suggested by the appellant simply will not work. For instance, building of the "local centre" could be conditioned but this could not guarantee that it would be occupied by services which would actually improve self-containment.

5 Submission of an incomplete application

5.1 The Planning Authority in their Statement of Case explain that many essential pieces of evidence to enable a balanced evaluation of the application were not provided prior to determination, or submitted too late in the process to enable full evaluation; this includes the viability assessment.

5.2 There was no feasibility evidence to support the claim that St. James and Burgate Schools could be expanded to cater for the population growth in Alderholt and no clear provision for Burgate in the viability appraisal. Burgate School could also be under pressure from housing growth in Fordingbridge, and Hampshire children would take precedence over Dorset children for admissions. This raises further doubts about the transport and environmental impacts of the scheme.

5.3 The applicant is clearly aware that further information is required because they propose to add further evidence between now and the appeal hearing. They are also attempting to evolve the proposals by addition of additional measures such as the Planning Energy Strategy. The proper approach is for the appellant to submit an application with all the necessary evidence.

6 Provision of affordable housing

6.1 One of the claimed benefits from the scheme is the provision of large numbers of affordable homes, albeit well below the level required by local planning policies. The high risk of viability problems with this application reduces confidence that even the level promised will be achieved.

6.2 There have been difficulties finding social landlords to take on units in Alderholt; for example Pennyfarthing's project in the village has recently dropped all social housing because of this. Dorset Council's "Housing allocation criteria" (see note 3) include:

- Close family continuous residency in the area (parents, siblings, non-dependant children)
- Paid employment in the Dorset Council area
- Offer of permanent employment to social tenant in the Dorset Council area
- People with support, care or medical needs

6.3 Because there are so few employment opportunities in Dorset that can easily be reached from Alderholt, the location is likely to be unsuitable for most of the people on the Dorset housing waiting list. The lack of local services and public transport in the village also make it difficult for many social housing tenants to live here. There is no evidence that the appellant will be able to deliver affordable housing to meet local needs in a sustainable way.

7 Transport study

7.1 It appears that the Transport Study is based on flawed assumptions and methodology. The study considers only the most optimistic scenario for traffic generation and none of the risks

inherent in delivering such a large and ambitious scheme. Some of the assumptions are unrealistic - for instance the assertion that no internal car journeys will be generated because all of the settlement is within a 15 minute walk; the eastern edge of the scheme is in fact located 1.6 miles from the Parish Church.

7.2 If the development turns out to reduce the self-containment of Alderholt (for example a smaller proportion of local people finding suitable employment and services within the village) the transport impacts would be of a different scale to those claimed. This would undermine the environmental assessment and lead to more substantial impacts on habitats sites.

7.3 We await further information from the appellant and Dorset Council and expect to submit further evidence in relation to this issue.

8 Conclusion

Action for Alderholt agrees with Dorset Council that this application would have substantial impacts on habitats sites if approved. We also agree that the negative impacts greatly outweigh the benefits of the scheme, and that there is great uncertainty about delivery of the benefits. The application submitted failed to provide essential evidence on impacts, viability and deliverability. The transport study and therefore the environmental assessment were fundamentally flawed. The appeal should therefore be dismissed.

Notes

1 There has been no significant development in Alderholt over the past 30 years so there is no evidence of demand. Two development schemes have been approved but neither made a contribution to local housing supply within 5 years. A scheme for 89 dwellings on the former Surplus Stores site was approved in 2007. Building did not start for 16 years and the site is currently under construction. Approval to build 45 houses on the Hawthorns Nursery site was granted at appeal in 2017. The appellant Gladman promised at the hearing that building would start immediately but there was a delay of 6 years before construction by Pennyfarthing Homes began late in 2023.

2 The most common destinations for Alderholt residents travelling to work are Fordingbridge (10% of the workforce), Bournemouth (9%) and Ringwood (8%) (source: Alderholt Parish Council Village Survey 2019). Therefore because of increased competition for jobs in Fordingbridge and Ringwood up to 18% of new residents (and a proportion of existing ones) could have to travel further to work. More evidence regarding the growth of local settlements and employment will be presented in May.

3 Source: Dorset Council Housing Allocations Policy 2021 - 2026