



The countryside charity
Dorset

Dorset CPRE

24th May 2023

Planning application: P/OUT/2023/01166

Case Officer: Ursula Fay

Closing Date: 10/06/23

Applicant: Dudsbury Homes (Southern) Ltd

1. Background

1.1 Current 2022/27 East Dorset 5 year housing land supply based on the Standard Method is 4.15 years. See:

<https://www.dorsetcouncil.gov.uk/documents/35024/382434/20230417+-+Five+Year+Housing+Land+Supply+Report+%28EDDC%29+-+Final.pdf/0483a2ea-1f3a-780a-0f28-c088f2094779>

1.2 Whilst this calculation is in accord with national policy, it should be noted that Dorset CPRE (DCPRE) considers the 2014-based household projections inherent in the Standard Method to be out of date and therefore not objective. Furthermore, the uplift of 40% applied to those projections is not considered by DCPRE to be a valid mechanism for calculating housing need, based as it is upon the local affordability index of 15.05: the notion that supplying land for 40% (capped) more homes would result in reduced prices is strongly contested. Work by Icen Projects for Dorset Council has shown that a housing supply on this scale cannot be sold to Dorset's population, and therefore cannot be thought of as scaled to local housing need. See paragraphs 6.44 through to 6.50 for instance:

<https://www.dorsetcouncil.gov.uk/documents/35024/2012718/Housing+Needs+Assessment.pdf/caac9843-8acc-66bd-91f3-554b75c70091>

2. Sustainable Development

2.1 Current National policy dictates that the application should be decided with a presumption in favour of sustainable development. The tilted balance is in favour of *sustainable* development: DCPRE is not convinced that a rural development of this scale can be thought of as sustainable unless it promises future-proof patterns of travel and energy consumption, but Alderholt Meadows offers neither.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

2.2 A recent appeal (APP/X0360/W/22/3309202) sheds light on what can be thought of as sustainable. The inspector opined that: “...I am satisfied that the question of scale of development is an important determinant when the sustainability of a location is under consideration.” Despite the lack of a 5 year land supply, he rejected an application to build 200 homes in Hurst Village near Wokingham because unsustainable car travel would be needed to nearby towns for secondary education, supermarkets, employment, leisure, health services etc. He admitted that a small development might be acceptable, but scale mattered and 200 homes was too many for that level of unsustainability.

2.3 NPPF para 105 says: “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” DCPRE does not believe that the Alderholt Meadows development offers a **genuine choice** of transport modes:

- The promised hourly bus service would not be a convenient alternative to private car journeys – buses need to run much more frequently to present a *genuine* choice.
- The B3078 road to Fordingbridge has a 60 mph section and a section where the road is too narrow even to afford a central white line. There are no pavements and walkers must share the road with motor vehicles. Neither cycling nor walking along it present any *genuine* alternative to using a private car.
- To Verwood, much of the road route (via the B3078 and Batterley Drove) has a 60mph limit and there are no pavements. It is a little wider, but too far to walk regularly. Again, neither cycling nor walking along it presents any *genuine* alternative to a private car.

2.4 The application admits freely that for people living in Alderholt: “...at present the majority of everyday needs are met by car travel to neighbouring settlements.” Of course, the proposal is that Alderholt would become more sustainable as a result of the new bus service and also by attracting (and funding) extra services within the village. Thereby it is hoped that fewer car journeys would be required to reach services beyond the village. This has a rob Peter to pay Paul logic. By doubling the population at what is clearly an unsustainable location, that location would become somewhat less unsustainable. But still there would be no supermarket, no secondary school, no major shopping area, no hinterland rich in employment opportunities, negligible leisure opportunities (notwithstanding the beautiful surrounding countryside), no nearby station, and no frequent bus services. Astoundingly, so much new traffic is envisaged that a junction on the A31, 5 miles to the south, would need to be modified to cope. To call Alderholt, after this development, a “15 minute neighbourhood” (in the Travel Plan) is surely an exaggeration. Yes, people would be able perhaps to walk or cycle to see a GP, but is that an adequate benefit to outweigh the harm to sustainability of locating perhaps 4,000 extra people in an essentially rural location? DCPRE does not think so.

2.5 The benefit of increasing the level of local services at Alderholt is constrained by the necessary phasing of the project. At a maximum build rate of 125 units pa, the 1700 homes would take at least 15 years to complete. It is not clear when the new infrastructure would start to affect the sustainability of rest of the village, funded as it must be by revenue from the house sales. Nor is it clear that as many as 1700 homes would necessarily be built at all, in which case Alderholt might gain several hundred homes and very little new infrastructure? A development of this scale obviously would be better planned within the local Dorset strategic planning system.

3. Economic Benefits

3.1 The application includes a short paper on *Expenditure Assumptions*. DCPRE takes issue with the calculations of £25.9 million net additional expenditure per annum in Dorset. While it might be true that the residents might eventually spend that much extra money in Dorset, the majority (if not all) of those residents would spend their money somewhere, whether or not Alderholt Meadows proceeds. Again, it might be that, as claimed, that money could support 386 FTE jobs, but if the money previously were spent elsewhere, those 386 FTE jobs are being moved, not created.

3.2 Obviously the development would generate economic activity in construction and the supply of materials. But in the longer term, the only new economic activity generated overall would be due to genuinely new households arising from additions to the working population country-wide. The rest can be thought of as a zero sum game played between all the local authorities in the country.

3.3 In fact the working age population in Dorset is projected to decline steadily, not to increase over the next 20 years (ONS 2018-based projection). It seems wrong therefore to claim that Alderholt Meadows could have any long term post-construction economic benefit that is not at the expense of losses elsewhere, and therefore not a net benefit at all?

4. Green Belt

The site lies outside of East Dorset's Green Belt area. Building at Alderholt offers an alternative to meeting East Dorset's housing need on Green Belt land. DCPRE believes that too much Green Belt land has been allocated for development already in the Dorset countryside adjacent to the BCP conurbation. Green Belt policy however is not intended to drive development to unsustainable locations, but rather to encourage land to be used and re-used within the existing BCP urban area. Dorset Council is wrestling properly with these issues and a forthcoming local plan remains the better way to resolve them.

5. Conclusions

Dorset CPRE objects to the Alderholt Meadows planning application:

- Alderholt is not, and would not become, a *sustainable* location for a development of this scale, and therefore cannot benefit from presumption in favour. A recent appeal decision 3309202 makes this clear.
- A proposal on this scale would better be considered by the Dorset local planning process, which is on-going despite policy uncertainty at national level. It would be a mistake to determine the whole future of Alderholt when significant and relevant changes in national policy are being put forward, and local Plans for DC and BCPC areas are under consideration
- The slow phasing of the project brings into question at what stage the important infrastructure (meant to improve Alderholt's sustainability) would be provided, if at all.
- The long-term economic benefits of the development are exaggerated.

Finally, please note our submissions in respect of the proposed development. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

Dorset CPRE 24th May 2023