

From: [action4 alderholt](#)
To: [Dutton, Holly](#)
Cc: [REDACTED]
Subject: APP/D1265/W/23/3336518: Land to the South of Ringwood Road, Alderholt; comments on proposed reforms to the NPPF
Sent: 13/08/2024 21:46:40

Dear Holly

We set out below the comments of Action4Alderholt relating to the new draft NPPF and how it relates to the appeal.

The Secretary of State has made it clear that; "We are also strengthening the general presumption in favour of sustainable development, by clarifying the circumstances in which it applies and introducing new safeguards to make clear that its application cannot justify poor quality development."

Parties to the appeal have agreed that the "tilted balance" applies in this case, so the most significant change proposed is the added text in para. 11dii of the draft NPPF. This adds new safeguards by giving more weight to "policies for the location and design of development (as set out in chapters 9 and 12)."

The appeal heard a great deal of evidence about conflicts between the appellant's proposals and policies in chapters 9 and 12. We will not repeat arguments on these issues because the Inspector will already have begun to form a view. Perhaps the key issue is that in para 107: "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."

There are few changes to chapters 9 and 12 in the new draft, but the Secretary of State has added the requirement that "a vision led approach to promoting sustainable transport modes is taken." We believe that evidence presented to the appeal showed that the appellant has failed to do this. Our closing submissions, CDK 028 include at paragraph 40 a list of issues which would be considered in a "vision led approach" but have not been addressed by the appellant.

Another key difference between the appellant and all other parties to the appeal was about the level of confidence that the development can be delivered, in the form and timescale proposed. The new NPPF framework is likely to make this less plausible.

For example, higher levels of housing growth and new policies regarding Green Belt will inevitably mean more sites becoming

available around the South East Dorset conurbation. These sites will be more attractive to developers because of higher house values and proven demand. Revisions in the NPPF also mean these locations will create higher levels of affordable housing, in locations which are more accessible for people in housing need.

Chapter 4 of the consultation document sets out the government's revised calculation for housing targets. Its ambition is to "achieve a more balanced **distribution** of homes across the country, by directing homes to where they are most needed". It is "designed to provide a stable baseline that drives **a level of delivery proportionate to the existing size of settlements**, rebalancing the national distribution to better reflect the growth ambitions across the Midlands and North". At the inquiry the appellant justified the development in terms of the overall need of East Dorset, but offered no evidence that the development was proportionate to the needs of the existing settlement of Alderholt or the surrounding area. It is our view that the proposal does not meet the aims of the revised target because the homes would not be "where needed": it is remote from significant areas of employment, education and retail and the vast majority of future residents would need to travel long distances, mainly by car, to access these services.

For these reasons we believe that proposed revisions to the NPPF amplify the reasons for dismissing the appeal. We leave other issues regarding plan-making to be addressed by Dorset Council and Alderholt Parish Council.

Best wishes,

Colin English, Chair, Action4Alderholt

Stephen Godsall, Secretary, Action4Alderholt