

**IN THE MATTER OF AN APPEAL OF AN APPEAL UNDER s. 78 TCPA 1990**

**BY DUDSBURY HOMES (SOUTHERN) LTD**

**MIXED USE DEVELOPMENT OF UP TO 1,700 DWELLINGS INCLUDING AFFORDABLE HOUSING AND CARE PROVISION; 10,000SQM OF EMPLOYMENT SPACE IN THE FORM OF A BUSINESS PARK; VILLAGE CENTRE WITH ASSOCIATED RETAIL, COMMERCIAL, COMMUNITY AND HEALTH FACILITIES; OPEN SPACE INCLUDING THE PROVISION OF SUITABLE ALTERNATIVE NATURAL GREEN SPACE (SANG); BIODIVERSITY ENHANCEMENTS; SOLAR ARRAY, AND NEW ROADS, ACCESS ARRANGEMENTS AND ASSOCIATED INFRASTRUCTURE (OUTLINE APPLICATION WITH ALL MATTERS RESERVED APART FROM ACCESS OFF HILLBURY ROAD)**

**APPEAL REF: APP/D1265/W/23/3336518**

**LPA REF: P/OUT/2023/01166**

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**CLOSING SUBMISSIONS OF  
ON BEHALF OF ACTION4ALDERHOLT  
A RULE 6 PARTY**

The appeal hearing has been very helpful in clarifying the appellant's proposals and the LPA's reasons for refusal. Action4Alderholt supports the cases made by the LPA and Alderholt Parish Council (APC). We will therefore concentrate on the ways in which the proposal would affect the local community.

1. Building 1700 homes in Alderholt, next to the Eastern boundary of Dorset, will have impacts on a wide area of East Dorset and West Hampshire. That is illustrated by the fact that objections were submitted by every democratically elected body affected - County and District Councils, the local MP, Parish Councils, New Forest National Park authority and Cranborne Chase National Landscape, all supported by evidence.
  - a. Building on this scale in Alderholt would create challenges for all the surrounding communities, for example;
  - b. It would mean increased traffic through tranquil areas and vulnerable villages such as Rockbourne, Harbridge and Cranborne.
  - c. It would lead to increased competition for school places and employment, and inevitably longer journeys to school and work.

- d. It would create more pressure on local services.
2. We appreciate that this happens to some extent wherever development takes place – what is unusual here, as described by the LPA planning witness, is the fact that people need to travel in many different directions to meet day-to-day needs.....It is not easy to serve such a location with public transport.
  3. The appeal process has left us in no doubt that the concerns of local people and local authorities are justified. We will expand on 5 key issues;
    - a. the proposals do very little to improve the self-containment of the village, or reduce the need to travel
    - b. the scheme consists primarily of a large commuter settlement with far too little employment for a scheme of this scale in this location
    - c. a genuine choice of transport modes is offered for only a small minority of these journeys
    - d. no significant improvement is offered to road infrastructure and there remain doubts about the deliverability of road improvements
    - e. There are long term impacts on the community, amenity and setting of the village. There are few compensating benefits. There are substantial uncertainties about delivery.

### **1 Our first concern is self-containment and day to day needs**

4. All parties to the enquiry agree that daily journeys by car for employment, education and services make the village unsustainable. The need to travel is not just an environmental concern; it clearly has a direct effect on communities. For example, a family may have children travelling to Wimborne and Cranborne for school .....and parents travelling long distances for work. This disrupts family and social life on a daily basis. Travel becomes a barrier to friendships, cultural and sporting activities.
5. Most people in Alderholt have experienced these challenges. But all the issues are amplified for families on low incomes. It's not a good plan for the future.
6. The appellant makes great claims about improving self-containment.
7. To make their case, they underplay the existing services<sup>1</sup> that have evolved in the village and exaggerate the benefits that their new services could bring, if they are even delivered at all.
8. Evidence from the LPA, APC and ourselves has identified significantly better existing provision than the appellant claims. Valued and vital

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<sup>1</sup> CDG 046C. English Rebuttal Proof. Para 2.1

services such as the post office and Alderholt Motors already deliver a good degree of trip internalisation Alderholt Vets and Pre-school day nursery are also operating at full capacity. But these have been left out of the appellant's equations. Their proposed additional services will only marginally reduce trips outside the village, and some will generate more trips into the village.

9. Questioning of the appellant's witnesses for retail, delivery and planning has made it clear that provision of additional **retail services, comparison shopping and hospitality** are entirely dependent on commercial interest. The retail witness Mr McCullum recognised that no market testing has been undertaken.
10. Local people particularly value the long Sunday opening hours (0800 – 2200 hrs) offered by the Coop and its integrated post Office. A larger, aggressively priced convenience store could force the closure of the Coop. There is no guarantee that this second convenience store would then take on an integrated Post Office service and the Post Office could be lost forever.
11. In respect of the proposed retail units, there can be no guarantee that they will be occupied or meet day to day needs. This cannot be conditioned into the permission. Some of the possible uses suggested by the appellant such as an estate agent will rarely if ever be used by most people.
12. Mr McCullum made it clear that the local centre will be delivered by a separate developer on a "free market" basis, with the only control over content being the planning conditions. That is logical because the whole development will stall until the terms of the S106 agreement are met. However, it means there can be no confidence that the centre will add to the self-containment and amenity of the village;
  - a. the only element which is certain is the community hall - 4 such facilities already exist in Alderholt
  - b. there remain doubts about when the GP surgery would operate, illustrated by an email from the managing partner of Fordingbridge practice quoted in A4A evidence; *"It isn't possible to say at this time how many homes would need to be built before it would make sense to operate a second surgery in Alderholt...the gradual growth of a few hundred houses here and a few hundred there as we have seen over the last few years makes it very difficult to plan the development of primary care"*
  - c. the appellant mentions a dental surgery and a pharmacy but there is no evidence of demand from operators. Mr McCullum confirmed that he has not explored the question of NHS approval and funding, which is needed for a new pharmacy *and is not currently available*

*in Dorset. This information is freely available on Dorset Public Health website.*

- d. it seems likely that a convenience store and coffee shop would be attracted to serve the new community but these facilities already exist in Alderholt
  - e. there is no evidence of demand from operators of comparison shopping; there must be doubts if this would succeed here, given the growth of online comparison shopping and the limited passing trade compared to Fordingbridge, which has many vacant units.
13. The LPA has expressed well-founded concerns about the location of the local centre. Even if the development proceeds at the very fast pace suggested by the appellant there will be a negative effect on the Coop until 2040 - if the pace is closer to the national and local average it will be 2050 before the negative effects on trading end. If the Coop closes, many existing users within walking distance would be likely to drive to the new centre.
14. **Education** was the one aspect of the original planning application that could have made a real difference to Alderholt. The appellant had ample opportunity to convince Hampshire and Dorset Education authorities of the potential for combining two tier education provision in FB and AH, thereby avoiding unsustainable travel for the majority of AH children. It is clear they had not done sufficient feasibility work to make the proposal convincing for either authority, despite the advantages to both in managing transport costs and fluctuating school rolls.
15. The fallback solution of expanding Alderholt's First School then also proved insufficiently thought through. This has led to the position where the appellant needs to amend their development plan to accommodate a 2 Ha school site, risking delays in starting the project and reduced viability, which could further reduce the amount of affordable housing to be delivered by the scheme.
16. It is suggested by the appellant that St. James First school could ultimately convert to a Primary School and become a feeder for Burgate Secondary in Fordingbridge. This is highly speculative as it requires;
- a. sufficient capacity at Burgate, which is unlikely given the expansion of Fordingbridge
  - b. approval of both Dorset and Hampshire education authorities
  - c. substantial capital expenditure for which feasibility work has not yet been considered
  - d. approval of DFE, having considered educational, capital and revenue implications

17. The appeal hearing made clear that most work, education, shopping and leisure trips will continue to be out of the village. But it is worse than that as the recent developments in the surrounding towns offer little or no employment opportunities and new residents of Alderholt will be forced to travel even further to find work.

**Having considered self-containment for services and education, we now move on employment.**

18. The only significant contribution to day-to-day needs within the scheme is **employment space**. The appellant has not disputed the estimates made in proofs of evidence by both APC and ourselves that there would be space for around 500 jobs.

19. There have been many references from the appellant to the concept of 15-minute neighbourhoods - to making this scheme an exemplar destination, comparable to Poundbury. The most striking difference between that aspiration and this proposal is the failure to integrate sufficient employment. Poundbury and similar schemes have achieved the creation of a new job for each household. Alderholt Meadows offers less than 30% of that.

20. Employment spaces within the scheme will again be provided by speculative developers, on a free market basis. This means there can be no control of the type of uses, beyond broad use classes. For example, certain warehouse uses provide very few jobs. There can be no clarity on the type or number of jobs which will be created, nor on the extent to which they will match the skills of the Alderholt workforce. The appellant's viability proof gives examples of employment land and market rates but these are not in comparable locations, all being close to major roads, rail, port and/or airport links.

21. It is not known how many of these new jobs would be taken up by people living in Alderholt and how many by inward commuters; local experience in Verwood suggests the latter would be a significant proportion.

22. Our evidence about the growing populations in Fordingbridge, Ringwood and Verwood, coupled with the two schemes already being built in Alderholt, shows that competition for local employment will be intense. Even if 70% of jobs went to residents of Alderholt Meadows, the new employment would only cater for 350 local people out of the predicted growth in population of around 3,800.

23. This represents inadequate self-containment for the day-to-day need of employment; there can now be no doubt that Alderholt Meadows would be primarily a very large commuter settlement.

**Our third significant concern is that there is not a genuine choice of transport modes.**

24. The appellant's travel plan anticipates very little in the way of modal shift from cars to other forms of transport. Targets are 2% of trips transferring to travel by bus and 2% to travel by bicycle. This confirms that the scheme offers a very limited choice of transport modes.
25. A subsidised bus service is offered for a limited period between Ringwood and Cranborne.
26. The appellant's transport witness claimed that up to 41% of journeys to work could use the new bus service. We stand by the analysis in our proof of evidence that only 15% of journeys outside Alderholt have a realistic option of bus travel. That takes account of shift working, evening and weekend activities. It also recognises that, for journeys beyond FB and Ringwood, bus connections will not suit the times of work for most employees, for example teachers who need to be at work before students arrive. And most places of employment in Salisbury and Bournemouth would require long walks from the bus stop and/or a third bus journey. Any modal shift is therefore unlikely.
27. A bus service to Verwood has potential, particularly if more commuters are moving between the two settlements. The appellant's planning witness Mr Jacobs stated this had been considered but not felt to be viable.
28. Cycling has potential to replace some car journeys to nearby destinations, particularly Fordingbridge and Verwood. If a safe cycle route could be created to Ringwood, this would also open up the employment areas around Three Legged Cross via the Castleman Trail. However the appellant has only offered a cycle route to FB, half of it along Ashford Road which is dark, damp and forbidding except during Summer. We do not consider this suitable for commuting or all-weather use. Even more confident cyclists would generally prefer the direct route along the B3078, notwithstanding the growing traffic and narrow carriageway. Less confident cyclists would simply stick to car travel.
29. Some cyclists already use the road route to Verwood, despite several stretches which are hazardous due to limited visibility and seasonal flooding. With safety improvements and flood alleviation over fairly short sections it could become an attractive route for regular commuters and access to services.
30. We can only conclude that the scheme does not offer a genuine choice of transport modes for the vast majority of journeys. This appears to be down to costs and viability but fails the test laid down in the NPPF.

**Our fourth point also relates to transport. No significant improvements are offered to road infrastructure and there are doubts about delivery of the mitigations proposed.**

31. The main concern expressed by residents of Alderholt and the surrounding communities is that the highway network is already inadequate and needs improvement before any further development takes place.
32. This clear message was given to the appellant in 2022 when they held a consultation event at the village hall. Local people feel the narrow roads around Alderholt are unsafe; they are used by increasing volumes of drivers who expect to travel at the national speed limit. This has got significantly worse over the past 30 years;
- a. cars have gradually become larger and faster
  - b. the number of delivery vehicles has multiplied
  - c. over the past 3 years, lorry traffic from the quarries just outside the village has increased greatly, as has construction traffic for the two building projects underway. This trend is expected to continue with extended quarry workings.
  - d. Where two large vehicles have to pass there is seldom room and usually both drive on the verge. This erodes the verge and damages the road edge; effectively reducing the width of safe road available for all drivers. This damage occurs on all access roads but its location is unpredictable and adversely affects the safe passing of vehicles, both during overtaking or passing oncoming vehicles.
  - e. many drivers get frustrated when travelling behind slower vehicles and use straight sections to overtake at unsafe speeds.
33. As heard at the appeal, the appellant's response has been "the existing network functions safely and can cope with the increased traffic". This is predicated on assumptions about trip internalisation which have been questioned by expert witnesses for both the LPA and Alderholt Parish Council, and by Hampshire County Council.
34. Further doubts emerged at the hearing. The appellant's transport witness, Mr Rand, said that traffic assessments are based on the assumption that no employees within the scheme will travel from outside Alderholt. The appellant's planning witness conceded that this is unlikely to be the case in the real world. There is no detail yet on whether jobs would match the skills of the Alderholt workforce. Therefore it is entirely possible that 50% or more of these jobs would be filled by people commuting into the village, as has happened in Verwood.
35. The effect on traffic flows would be to increase the movements assumed by the traffic assessments. For example, if 500 jobs are created and 50% filled by inward commuters, that would increase predicted traffic movements in the morning peak by 250 trips into the village and 250 trips out.....
36. The appellant has had over 18 months to convince Hampshire CC that the proposed road mitigations in Fordingbridge can be made to work. They

have failed despite a clear incentive for the authority to embrace any realistic proposal, which would save them future costs in road schemes.

37. Mr Rand said that highways impact assessment was done for junctions only and not for the roads themselves. This results in an underestimation of potential delays. An example is Castle Street in Cranborne where the ever-present parked cars effectively reduce it to a single track with no line of sight along its length. Mr Rand confirmed that no modelling was carried out on the any roads and therefore reassignment due to increased delays at pinch-points cannot be evaluated.

38. Mr English set out in his proof several key differences between rural roads and urban streets. These differences mean that greater passing widths are required on rural roads to allow safe conditions when passing other vehicles. The poor verge and pavement edge conditions, vegetation encroachment, and higher speeds are examples. In his proof, Mr English illustrated some of these problems, together with examples problems that occurred as a result of driving too close the edge of the road surface.....

39. We appreciate that transport a complex issue but a scheme of this size is the only opportunity to take a strategic approach, with the necessary investment to make access to the village safer and more sustainable.

40. A strategic approach would include considering;

- a. more bus routes; at the very least a route to Verwood and evening/weekend services on the service that is proposed
- b. a direct, surfaced and lit cycleway/pedestrian route to Fordingbridge
- c. a more ambitious travel plan with a 20% modal shift and an incentive for developers to achieve this
- d. safe cycle routes to Verwood and Ringwood, much of which could be along roads but with flood alleviation and safety improvements
- e. a clear strategy for which roads have widening to improve flows and which retain narrow sections, using signposting, calming measures and speed limits in some cases
- f. engagement with Hampshire and Dorset transport authorities and the local community to find the best solutions for each route

**5 Our final topic covers detrimental impacts on the village, with substantial uncertainty about delivery and few compensating benefits for the existing community.**

41. There are clear differences between the appellant and local people about the negative impacts of the scheme, on the amenity, setting and community of Alderholt. We were surprised to hear Mr Jacobs claim that there would be "no impact on the landscape character and quality of the area". That is not how it looks from Alderholt. We accept that any



development will have impacts on people living nearby but this scheme will dominate our village and completely change its character.

42. The proposals may look like Poundbury to the appellant but they are in a totally different context, divorced from the employment, services and education choices in Dorchester and without adequate road or rail transport links.
43. We have described many of the community impacts already but one we have not covered is uncertainty. Whilst the appellant claims the scheme could be complete by 2038, both local experience and national research in the Letwin report suggest this is unlikely. We have experience in Alderholt of sites with outline planning approval being left derelict for up to 16 years while they await detailed planning approval and development. And that is before building even starts.
44. The amenity of the village would be severely affected for many years by construction works and disruption to travel.
45. Given the scale and complexity of the scheme, it is surprising that the appellant is so confident it can be delivered a speed. As we have heard in evidence, there are a large number of "moving parts" and developers who will need to be involved. When this issue was put to Mr Jacobs and Mr Mound, they explained that an unusual amount of preparatory work had been undertaken, so they regarded the scheme as "ready for take off." Whilst we don't doubt the quantity of this work, little evidence has been presented to give confidence everything is indeed resolved and ready. In our experience it is unusual to have such an ambitious and advanced proposal without the involvement of an identified housing developer with a track record of delivery.
46. When asked about development partners, Mr Mound referred to the list in his proof at .... However, evidence of an initial conversation is very far from an agreement to proceed on specific terms and timescales.
47. For example, the appellant's viability proof says that the micro-grid energy system; "is still relatively innovative technology and the technical and commercial considerations relating to this are still under development....."
48. Clearly, commercial terms for this system will need to be agreed with all housing developers, in sufficient detail that they are confident it will prove marketable to house buyers - --- who are notoriously suspicious of innovative energy schemes. Yet there is no evidence of any discussion about this issue with potential housing developers. The energy market is fast moving and it is hard to predict how this will play out for later phases.
49. The process leading up the appeal illustrated that a significant number of the proposals in the original application have not proved deliverable – examples include the education strategy, the cycleway to Verwood, a library and a youth centre. Maybe this is because the application was

submitted in some haste but there remain doubts about deliverability of the scheme which has now evolved.

50. The hearing revealed other aspects which may not prove deliverable, or may cause delays;
- a. the junction proposals and/or one-way system in Fordingbridge
  - b. the design of Ringwood Road leading to the junction with the link road to accommodate large vehicles, cyclists and pedestrians; Mr Jacobs confirmed that there is "no plan B" if this link can't be made
  - c. the LPA witnesses have observed that the outline application contains less detail than they would expect for a scheme of this scale and complexity, meaning that detailed planning processes may be a more lengthy and contentious than usual
  - d. Further planning approvals for mineral extraction, battery storage and the school site. Details of the mineral works and methods of processing are still not clear.
  - e. the project plan suggests an exceptionally fast pace of delivery; the Letwin report found that schemes of this size deliver build rates of 3.2% to 6.5% pa, compared to the 8% assumed here. The delivery witness acknowledged that this is a best case scenario
  - f. Delays could result from;
  - g. market factors, eg house-builders and developers preferring opportunities elsewhere
  - h. supply side issues eg shortages of labour or materials
  - i. or more national/global factors eg pandemic, financial crisis – of which there have been 6 over the past 60 years.
51. Pace can't be guaranteed and delays could mean construction lasting 30 years and/or some elements not being completed, a truly worrying prospect for so many people in Alderholt.

## **Conclusion**

52. The inquiry has heard that the appeal proposal can only marginally change the sustainability of Alderholt – there is indeed a risk that sustainability will decline because more children will need to travel West to school.
53. Journeys to work will tend to be longer for the majority of people moving to Alderholt Meadows.
54. Changes to services which are claimed to promote self-containment will assist very few day to day activities and journeys. The scheme offers a genuine choice of transport mode to only a small minority of existing and future residents. For that reason alone it fails to meet the policies set out in the NPPF at paragraph 74 and should be refused.

Stephen Godsall, Secretary A4A

19 July 2024