



Sam Gibbs-Jones

27 April 2023

Dear Mr Gibbs-Jones

Case Number 23/50247CON
Proposal Consultation P/OUT/2023/01166. Mixed development of up to 1,700 dwellings and 10,000 sq.m of employment floorspace
Site Land to the south of Ringwood Road, Alderholt

Thank you for your correspondence received on 29 March 2023.

Please find attached the comments from our Policy team, setting out the New Forest National Park's response to your consultation, the conclusions of which are set out below.

- Dorset Council has a legal duty to consider the impacts of this application on the National Park, located less than 5km to the east. Government guidance recommends such an assessment is made publicly available and we would encourage Dorset Council to set out their assessment of potential impacts on the New Forest National Park, including its designated sites.
- The application site is within the 13.8 km 'zone of influence' for recreational impacts from new development on the New Forest's internationally designated sites. The National Park Authority does not support the position that potential recreational impacts on site integrity in the New Forest from over 4,000 new residents can be addressed through measures set out in the Dorset Heathland Planning Framework SPD. This framework does not deliver mitigation measures within the New Forest and without such measures we do not consider the tests set out in the Habitats Regulations relating to the integrity of the New Forest's site can be met.
- The National Park Authority does not agree that potential air quality impacts can be scoped out at the HRA stage and not proceed to an appropriate assessment. Uncertainty remains about whether in combination traffic growth and related air pollution could adversely affect the integrity of New Forest SAC, SPA and Ramsar site and the precautionary principle should be applied.

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CHAIRMAN GAVIN PARKER CHIEF EXECUTIVE ALISON BARNES

- As a general point, proposed major strategic developments of this scale are best considered through Dorset Council's Plan-making process, rather than speculative planning applications.

Please do not hesitate to contact me on the number below if I can be of further assistance.

Yours sincerely



Liz Marsden
Planning Officer

Direct Line: [REDACTED]

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Thank you for consulting the Policy team on this outline application received by Dorset Council for up to 1,700 dwellings and 10,000m² of employment floorspace on land to the south of Ringwood Road, Alderholt. Set out below are our comments.

1. 'Duty of regard' towards the statutory National Park purposes

Dorset Council has a statutory 'duty of regard' towards the two National Park purposes set out in Section 62(2) of the Environment Act 1995. This legal duty recognises that the delivery of the National Park purposes rests with a range of relevant bodies, not just the respective National Park Authorities. It also acknowledges that planning decisions made outside National Parks can impact on them. Further details on the legal duty of regard are available in the NPPG resource on the 'Natural Environment' under 'Landscape'; and also in the Defra guidance note 'Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads'.

This duty of regard is supported by paragraph 176 of the NPPF (2021), which states that development within the setting of National Parks (and AONBs) should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. The application site at Alderholt is located close to the New Forest National Park and also the Cranborne Chase & West Wiltshire Downs AONB and the submitted evidence on the zones of theoretical visibility indicates development would be visible from these two nationally protected landscapes. In accordance with their duty of regard, Dorset Council should set out their assessment of how the proposals would impact on the adjacent National Park and AONB.

2. Potential impacts on the New Forest's internationally designated sites

(i) Recreational impacts

Over 50% of the New Forest National Park is designated as being of international importance for nature conservation. These designations – comprising the New Forest SAC, SPA and Ramsar – are legally protected and as 'competent authority' it is Dorset Council's responsibility to consider potential impacts from this application.

The most up to date evidence on recreational impacts on the New Forest's designated sites is the Footprint Ecology research reports from 2020 and 2021 – see Research into recreational use of the New Forest's protected habitats - New Forest National Park Authority (newforestnpa.gov.uk). These reports are endorsed by Natural England and identify a 13.8km 'zone of influence' for the New Forest's designated sites for recreational impacts from new development. The application site at Alderholt is well within this 'zone of influence' and therefore mitigation for recreational impacts on the New Forest is required for legal compliance.

The supporting information submitted by the applicant to inform the Council's HRA states, "The New Forest International Sites also have the potential to be affected by increases in recreational pressure, however as the impact pathway is identical to that

assessed in relation to the Dorset Heath(land)s designations, any impact avoidance and mitigation measures prescribed in relation to the more proximate Dorset-based designations will inherently address effects on the more distant New Forest (Hampshire-based) designations. This position was agreed with Natural England during the pre-application consultation meeting in June 2022. Therefore, a detailed assessment in relation to the New Forest designations has not been undertaken.”

We do not support this stated position. The respective New Forest and Dorset Heathlands designations have different characteristics, management regimes, species, pressures and mitigation approaches. The Footprint Ecology evidence shows that the ‘zone of influence’ for the New Forest’s designated sites is 13.8km, indicating their draw is far greater than the smaller, more fragmented Dorset Heathlands. Development at Alderholt and the potential increase of 4,000 residents living within less than 5km of the New Forest’s designated sites requires bespoke mitigation, rather than assuming measures to address separate impacts on the Dorset Heathlands will suffice. This is the same principle as to why development in areas of the New Forest National Park is required to separately address recreational impacts on the New Forest and Solent coast designations.

The mitigation measures set out in the Dorset Heathlands Planning Framework SPD are not tailored towards mitigating impacts on the New Forest and do not deliver any mitigation within the New Forest itself. At the very least we would expect contributions towards access management and monitoring measures (SAMM) within the New Forest’s designated sites to support the proposed on-site green infrastructure provision. The Footprint Ecology evidence highlights significant use of the New Forest from Dorset residents and these impacts are not covered by the Dorset Heathlands Mitigation Plan SPD. Sole reliance on this SPD to address increased recreational impacts arising from development in Dorset on the New Forest’s internationally designated sites is not supported by the Authority.

(ii) Air Quality

The ecological information submitted in support of the application scopes out potential air quality impacts from the proposed development on the New Forest’s designated sites due to ‘no viable impact pathway’.

The HRA work for both the respective New Forest National Park Authority and New Forest District Local Plans identified the need to monitor in-combination air quality impacts on the New Forest designated sites arising from planned new development. Given the proximity of the application site to the New Forest and the links from Dorset across the New Forest (e.g. A31), our view is that the proposed development at Alderholt may result in effects upon the New Forest’s designated site as a result of nitrogen deposition through an increase in vehicle exhaust emissions. We therefore do not agree that potential impacts can be scoped out at the HRA stage and not proceed to an appropriate assessment. Uncertainty remains about whether in combination traffic growth and related air pollution could adversely affect the integrity

of New Forest SAC, SPA and Ramsar site during the period up to 2036. With this uncertainty in the data, the precautionary principle applies and air quality monitoring is required within the New Forests designated sites. If Dorset Council ultimately decides to support this application, the potential air quality impacts on the New Forest would need to be addressed.

3. Other comments

The technical environmental assessments have been undertaken by the consultants EPR. It is suggested that the Biodiversity Net Gain assessment is re-run using the updated metric 4.0 – the submitted calculations are based on metric 3.1, the version in place at the time the supporting evidence was prepared. The submitted assessment concludes the development will deliver a gain of +13.16% in biodiversity units, but this may be altered when the calculations are run through the latest metric.

Other consultees including Hampshire County Council and New Forest District Council are best placed to comment on transport impacts in Hampshire. We note the main road access from Alderholt to the A338 involves the B3078, which is single track along Provost Street at Knowles Bridge in Fordingbridge. A development of this scale will impact Fordingbridge and the highway network through it.