

To: Liz Marsden, Development Control  
From: Policy Team  
Re: 23/50392CON - Mixed development of up to 1, 700 dwellings Application  
Number: P/OUT/2023/01166  
Land to the South of Ringwood Road, Alderholt  
Date: 31 May 2023

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Thank you for consulting the Policy team on the additional information provided by the applicant in relation to this proposal for major development at Alderholt. Ultimately Dorset Council is the 'competent authority' under the Habitats Regulations and will therefore need to consider potential impacts from the 1,700-dwelling proposal at Alderholt on a range of internationally designated sites through the HRA and appropriate assessment processes.

Dorset Council will be aware that in 2017 a High Court judgment against the adopted Lewes/South Downs Joint Core Strategy concluded that the methodology used in the HRA to rule out the potential for 'in combination' air quality effects from the Plan on Ashdown Forest SAC was legally flawed. This was essentially because the HRA relied entirely on examining the flows arising from the Joint Core Strategy in isolation and took no account of the potential in-combination growth from other planning authorities that all impacted on vehicle flows through the SAC. The HRA of the Plan had not attempted to quantify the 'in combination' effect and this legal principle is the basis for the National Park Authority's previous comments to Dorset Council regarding in-combination air quality impacts on the New Forest's designated sites.

Further background is provided in the Dorset Council Local Plan consultation that took place in early 2021 and was accompanied by a Habitats Regulations Assessment Screening Report – see [0c7ba076-086b-71c7-1a20-bb7347d38c89 \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/0c7ba076-086b-71c7-1a20-bb7347d38c89). This contained coverage of potential air quality impacts from planned development in section 4.2, with main conclusions including:

- Figure 4.1: Potential impact pathways identified for the Dorset Council Local Plan: Potential air pollution impacts are identified for the New Forest SPA.
- Paragraph 4.3.20: *“Development through the Dorset Council Local Plan is unlikely to directly affect air quality at the New Forest European site, for example through industrial and agricultural development, given the distance of the plan area from the New Forest designation. However, it may result in a likely significant effect upon the New Forest European site as a result of nitrogen deposition through an increase in vehicle exhaust emissions caused by development in Dorset.”*

In accordance with the High Court judgement in the Ashdown Forest SAC case, Dorset Council will need to consider the potential for in-combination impacts from planned development on air quality in the internationally designated sites of the New Forest. The applicant has provided further information stating that the HRA of the application identifies the road links predicted to experience an increase in traffic flows of more than 1,000 AADT (or 200 HDV) as a result of the proposed development either alone or in combination with other committed development. This does not include any of the routes crossing the New Forest's designated sites.

In response, we request clarification on what ‘in combination’ developments were factored into the applicant’s assessment? For example, the site at Alderholt is located in close proximity to several strategic development sites in the adopted New Forest District Council Local Plan (2020). These site allocations (see below) are now coming forward as planning applications, often with dwelling capacities well in excess of those identified at the Plan-making stage (e.g. the outline application for site SS14 at Hightown Road, Ringwood, proposes 400 dwellings compared to the minimum figure of 270 dwellings set out in the Local Plan – an increase of 48%).

- SS13 – Land at Moortown Lane, Ringwood – at least 480 dwellings
- SS14 – Land north of Hightown Road, Ringwood – at least 270 dwellings
- SS15 – Land at Snails Lane, Ringwood - at least 100 dwellings
- SS16 – Land north of Station Road, Ashford – at least 140 dwellings
- SS17 – Land at Whitsbury Road, Fordingbridge – at least 330 dwellings, in addition to the 145 already permitted within the site
- SS18 – Land at Burgate, Fordingbridge – at least 400 homes

In conclusion, we would expect Dorset Council to consider in-combination air quality impacts from the development in accordance with the Ashdown Forest SAC High Court judgement. The best available figures for the dwelling capacities on New Forest District Council’s site allocations should be considered as part of this assessment, as the quantum of development identified at the Plan-making stage on the strategic site allocations in Ringwood and Fordingbridge (a minimum of 1,720 additional dwellings, or 1,865 when those already permitted on site SS17 are included) is likely to be significantly lower than the actual quantum delivered through the detailed planning applications. Dorset Council’s Local Plan consultation in 2021 highlighted the potential for likely significant effects upon the New Forest European sites as a result of nitrogen deposition through an increase in vehicle exhaust emissions caused by development in Dorset. We therefore request further clarification on the consideration of ‘in combination effects, which will be necessary for the Council to conclude no likely significant effects through the HRA process.