

Ursula Fay
Planning Services
Dorset Council
County Hall
Dorchester
Dorset DT1 1XJ

Our Ref: ENQ/23/20089
Your Ref: P/OUT/2023/01166

31st May 2023

Dear Ms. Fay

Proposal: Mixed use development of up to 1,700 dwellings

Site: Land To the South Of Ringwood Road Alderholt

Thank you for consulting New Forest District Council (NFDC) as an adjoining Local Planning Authority on the above planning application.

NFDC has previously provided responses to the consultations undertaken by Christchurch Borough Council & East Dorset District Council on their joint Local Plan. NFDC also provided a response to the Dorset Council Local Plan Options consultation which took place between 18 January and 15 March 2021. The responses addressed proposals for potential growth options at Alderholt. The consultation responses are attached as they raised many of the concerns that we now raise with this application.

NFDC is aware that preparation of the emerging Dorset Local Plan has not proceeded through the stages of plan making as originally envisaged and, as such, many of the issues raised in our March 2021 response to the proposals for growth at Alderholt remain unresolved.

The submitted planning application has not addressed many of the concerns raised regarding comprehensive analysis of impacts and identification of alternatives or mitigation that could arise from this site being promoted through the plan making process.

We have set out a summary of key issues that we would encourage Dorset Council to be mindful of when reaching a decision.

Planned Development in Fordingbridge and Ashford

The NFDC Local Plan 2016-2036 Part One: Planning Strategy (6 July 2020) sets out significant development growth at Fordingbridge and Ashford. Fordingbridge is identified in the NFDC Local Plan settlement hierarchy as a town with access to a wide range of employment, facilities and services. Ashford is identified in the NFDC Local Plan settlement hierarchy as a main village with a limited to moderate range of local services.

Whilst a distinct settlement, Ashford is however within walking distance (approximately 1km) of the facilities in the centre of Fordingbridge.

Planned development in the area includes the following Local Plan allocation sites:

- Strategic Site 16: Land to the north of Station Road, Ashford (at least 140 homes)
- Strategic Site 17: Land at Whitsbury Road, Fordingbridge (at least 330 homes)
- Strategic Site 18: Land at Burgate, Fordingbridge (at least 400 homes)

Therefore, planned development in Fordingbridge and Ashford is anticipated to deliver at least 870 new homes in the plan period to 2036, although the final figure may be higher still depending on the final housing mix. For reference, housing development has already been consented and built within Strategic Sites 17 and 18. NFDC currently anticipate that further applications for housing within these allocation sites will come forward shortly.

NFDC is also progressing a live application at Strategic Site 16 (Ref: 23/10316) for 206 new dwellings. It is anticipated that this application will be determined by this Council later this year.

Therefore, given the extent of planned development in Fordingbridge and Ashford, NFDC considers it is essential that planned growth within the Fordingbridge area is fully taken into account when considering any relevant material considerations in the determination of the Alderholt application.

Hampshire County Council response

NFDC fully endorses the response to the application from Hampshire County Council (HCC) (9 May 2023) including Annexes 1 to 4 inclusive. This includes the material considerations of highways and access, education, public rights of way and the need for an on-site minerals assessment.

i. Highways and Access

NFDC shares the concerns raised by HCC that the proposal would not encourage active travel or sustainable transport modes and would instead rely almost wholly on private vehicle journeys. The proposal would have a significant harmful impact on the local road network in this part of New Forest District. Alderholt is not an accessible location and has little or no public transport connections, with no rail station or commercially run bus routes.

Furthermore, NFDC has concerns regarding the impact on the character and amenity of Fordingbridge and Ashford that the likely volumes of vehicle movements generated by the proposed scheme would give rise to. Similarly increases in vehicle movements in rural parts of New Forest District, such as Harbridge Drove, at the likely scales arising from this development would materially impact on the character of the environment and the amenity of residents in that area.

Noting the concerns of HCC regarding the trip rates adopted by the applicant being lower than those agreed in association with the planned developments in Fordingbridge and Ashford, these above impacts on the local road network would likely be exacerbated further still.

This is also a particular concern in Fordingbridge town centre, where due to the tight historic urban form, the worst traffic queuing, and hence associated negative impacts, are likely to occur. If the Air Quality Assessment (AQA) is based on the submitted Transport Assessment (TA) which fails to account for the planned development in Fordingbridge and Ashford, it significantly

underestimates the potential vehicle movements and therefore the impact on local air quality. The consultant has also failed to have regard to the Fordingbridge monitoring presented in the Air Quality Annual Status Report 2022.

ii. Education

With regard to the Fordingbridge and Ashford Local Plan allocation sites, NFDC has worked with Hampshire County Council as the Local Education Authority to ensure the education needs arising from those developments are met. It was concluded that sufficient school places were available at the Burgate school in Fordingbridge to meet the predicted number of secondary age students arising from those allocation sites, subject to students from outside Hampshire being excluded.

Hampshire County Council are the responsible body for schools/education within Fordingbridge and they have responded directly on this issue.

New Forest National Park Authority

NFDC also endorses the response to the application from the New Forest National Park Authority (NFNPA) (27 April 2023).

NFDC share the concerns of NFNPA in respect of the approach to screening out recreational and air quality impacts on protected sensitive habitats in the New Forest from the shadow Habitats Regulations Assessment. As a 'competent authority', Dorset Council should satisfy itself that the scheme would not give rise to likely significant effects, or that identified mitigation can avoid adverse effects occurring. In accordance with the precautionary principle, NFDC considers that it would not be possible to conclude that likely significant effects would not occur. Hence, suitable mitigation to address this issue will need to be secured.

Dorset Council should also be aware of the need to ensure that the proposed development demonstrates that it is nutrient neutral. The condition of the habitats along the river Avon are under threat from eutrophication. This application site is considered by NFDC to fall within the catchment of the river Avon and, as such, its impact should be identified and mitigated as part of any planning consent.

Landscape Impacts

NFDC raises significant concerns in respect of the impact of the proposal on the rural character and visual amenity of the countryside in this part of New Forest District. This includes:

- The proposed access route (a roundabout) is proposed in a location where there are mature oak trees located along the roadside, contributing positively to the character of the area. The proposed access would result in the removal of these trees, which combined with the scale of highway works to form the roundabout, would have a likely significant impact on the rural character of Hillbury Road. The CGI visualisations, prepared in support of the application, do not include a view into the site at this point.
- Loss of these trees and the open space created by the roundabout is likely to expose the development to views from the land to the east. Of particular concern is the lack of any parameters being proposed for the scale of the commercial/industrial development proposed adjacent to the roundabout, and the potential impact of taller industrial scale

buildings, over a large footprint, could have on the rural character of Hillbury Road and land to the east. It is noted that the submitted Design Code does not include a code for this part of the development.

Summary

The NPPF (July 2021) Paragraph 15 is clear that “the planning system should be genuinely plan-led”. In this instance, the concerns NFDC has set out primarily relate to the failure of the applicant to follow the process of promoting the site to Dorset Council through the emerging Local Plan. If the site promoters awaited the traditional plan-led approach, the cumulative impacts and opportunities would be subject to suitable public scrutiny during the examination process with the aim of ensuring an appropriately scaled and sustainable development.

In line with the responses from Hampshire County Council and the New Forest National Park Authority, NFDC has clear reservations about the ability of the existing infrastructure in both Alderholt and New Forest District to support the scale of development proposed in this application. The proposal would undoubtedly place significant additional pressure on schools, highways and other infrastructure in Fordingbridge, Ashford and the rural areas in the westernmost part of New Forest District. The proposal has also failed to address local environmental and landscape cross-boundary impacts in New Forest District.

Should Dorset Council be minded to support the application, then it will be essential to work constructively with adjoining local authorities including NFDC to identify the mitigation and contributions that will be necessary to make this development acceptable in planning terms.

Yours sincerely



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Appendix 1 – NFDC response to CBC&EDDC Local Plan consultation. Aug 2018

Appendix 2 – NFDC response to Dorset Council Local Plan consultation. Mar 2021