



Pennington and Lymington Lanes Society (PALLS)

Protecting the distinctive character of our lanes



pennandlymlanes@gmail.com

7th October 2022

Councillor James Hoare
Town Mayor
Lymington and Pennington Town Council
Town Hall
Avenue Road
Lymington SO41 9ZG
By email: info@lymandpentc.org.uk

Dear Councillor Hoare

The Pennington and Lymington Lanes Society (PALLS) are supportive of the neighbourhood planning process. As such, we have been asking to engage in meaningful consultation with LPTC since 2018. However, we have been given no opportunity to talk to the Steering Group, the Town Council's consultants or anyone else connected with the Neighbourhood Plan. In your latest response, dated 24th May 2022, PALLS were told they may be given the chance to comment on a 'draft' draft plan in August/ September before the formal consultation (known as Regulation 14) takes place. Subsequently we were given just 7 days (since extended to 28 days) to comment on 100 pages of supporting documentation published on your website on 21st September 2022.

PALLS regret that the Town Council appear to have a fundamental misunderstanding of what a Neighbourhood Plan actually is. Neighbourhood planning should be an iterative process where successive rounds of public consultation identify both issues of concern and seek to build a consensus within communities about the priorities and policies *the community* wishes to see – albeit within a framework of consistency with adopted Local Plan policy. To date, there has been a fundamental lack of openness and transparency in this process. The guidance is clear, and we have included references at the end of this letter.

PALLS welcome the very recent updating of the Neighbourhood Plan pages of your website – especially as these have remained unchanged since December 2018. The fact that all members of the Steering Group are identified as town councillors and chairs of committees emphasises our point: there is no representation from any other member of the community on the Steering Group. Reference is made to 7 working groups dealing with different aspect of the plan which are stated to be made up of local residents living and working in the area; however, they are not identified and no minutes of their meetings are provided. Some minutes of the meetings of the Steering Group are provided – they appear to have met 13 times in the 7 years since the process started. No terms of reference for either the Steering

Group or any of the working groups are provided other than a brief description of each working group.

In relation to housing development, the role of the Strategic Sites working group is stated to be:

'investigating the strategic sites proposed by the Local Plan, working with the developers on the sites to ensure that a masterplan framework for the area is appropriate for the local community. Establishing potential smaller sites for development and extensive research into the dwelling type and mix.'

The only communication mentioned here is with **the developers, not the community**. We would ask who is best placed to judge whether a masterplan framework is 'appropriate for the local community', the local community or the developer? We are seeking a balanced approach where the community voice is integral to the plan making process; not included as an afterthought, or in a 'take it or leave it' token consultation once the plan has already been drafted.

As a result of the refusal of the Town Council to engage in any dialogue with us, despite our repeated requests, we have produced a **Manifesto for the Lanes**. We present this to the Town Council with a request that it **forms part of the evidence base for the Neighbourhood Plan** and is used in the production of policy for the Lanes both within the District Council and the National Park areas, as the Neighbourhood Plan boundary straddles both. In the interests of brevity, we have presented it as a series of bullet points and would be happy to provide supporting evidence as required. The Manifesto has been written by the PALLS Steering Group and will be shared with our membership of 700+ who support PALLS's aim to protect and enhance the tranquillity, rural environment and special character of the Lanes and their environs.

MANIFESTO FOR THE LANES

- The adoption of a Safer Lanes network, promoting the Lanes as shared spaces with consideration for pedestrians, cyclists, horse-riders, and vehicle users alike, recognising their value as recreational routes and as a network connecting the town to the salt marshes and the sea, and promoting a 20mph speed limit within the Lanes as supported by our members.
- Protecting the existing rural characteristics of the lanes and their ancient historic use as drovers' routes, retaining these routes without alteration, protecting the verdant character as green tree lined lanes with soft verges, (no footpaths and limited lighting), recognising the value of the green triangles at the junctions and preventing the loss of vistas and views to the surrounding landscape.
- Encouraging the development of indigenous wildflower areas within verges and reducing mowing regimes to promote biodiversity.

- Promoting the principles of dark skies to address the negative effects of excessive lighting on biodiversity, encouraging additional lighting only where essential and the provision of directional and sensor lighting.
- Principles for new development within the area of the Lanes:
 - o Retention of the key rural characteristics including soft tree and hedgerow lined frontages with any fencing set back from the lane and screened with hedgerow planting, permeable frontages, not gated developments, preventing the urbanisation of the lanes through the introduction of kerbs or urban highway edges, limiting additional street lighting and the retention and maintenance of all ditches and verges.
 - o Ensuring any new development does not lead to parking on verges and existing parking on verges is controlled and actively discouraged to prevent damage to biodiversity.
 - o Controlling lighting to reduce light pollution and spillage.
 - o No culverting of ditches to reduce the risk of flooding as well as to support flora and fauna and biodiversity.
 - o Access arrangements should prioritise pedestrians and cyclists over vehicles and not facilitate opportunities to rat-run on surrounding lanes.
 - o Maintain the key characteristics (identified in the Lymington Local Distinctiveness SPD) of varied green verges and ditches; hedgerow boundaries and mature native trees which underpin the richness and delight of a walk down these lanes.
 - o Ensure that any development within the New Forest National Park must be fully justified and comply with the relevant policies of the NFNPA.
 - o Any new vehicular access onto the Lanes must retain the existing historic physical line of the lanes without alteration, re-routing or widening.
 - o Design and density of new housing must reflect the character of surrounding development.
 - o All trees and hedgerows that are in satisfactory condition must be retained and fully integrated into the development in such a way that they will not be subject to future pressure to reduce or fell.

We repeat our request to meet with you to discuss our vision for the Lanes at your convenience and look forward to hearing from you.

Kind regards,

Bruce Tindall

Chair

Cc: Louise Young, Town Clerk

What a Neighbourhood Plan should be:

The Good Councillor's Guide to neighbourhood planning 2017 produced by the National Association of Local Councils advocates the production of a community engagement programme at the beginning of the neighbourhood planning process. No such document has been produced by Lymington and Pennington Town Council (LPTC) who are the 'qualifying body' responsible for the production of the plan.

In their Planning Practice Guidance the Government say that:

'A qualifying body should be inclusive and open in the preparation of its neighbourhood plan or Order and ensure that the wider community:

Is kept fully informed of what is being proposed

is able to make their views known throughout the process

has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order

is made aware of how their views have informed the draft neighbourhood plan or Order.'