



11<sup>th</sup> January 2021

Ms Liz Young  
Planning Officer  
New Forest National Park Authority  
Lymington Town Hall  
Avenue Road  
Lymington  
SO41 9ZG

By email: [liz.young@newforestnpa.gov.uk](mailto:liz.young@newforestnpa.gov.uk)

Dear Liz,

**PALLS representations on NFNPA planning application ref 20/00861**

Please consider the following objection from the Pennington and Lymington Lanes Society (PALLS) to the above planning application. We look forward to receiving confirmation of receipt.

**1. Lack of Information**

The information submitted with this application is seriously deficient given that it is proposing major development of just under 4,000m<sup>2</sup> of intensive horticultural floorspace and ancillary development within the New Forest National Park.

An LVIA (Landscape Visual Impact Assessment), an FRA (Flood Risk Assessment), Transport Assessment, full ecological assessment and a properly detailed assessment of alternative site options should have been submitted as a minimum and the application should either be rectified (with a further period for public consultation) or refused on the grounds of lack of/inadequate information.

**2. Nursery retention**

PALLS appreciates the desire of the owners of Northfield Nursery to continue their business Operation. Furthermore, PALLS objected to the loss of the business as part of its representations to NFDC objecting to the proposed allocation of SS6. These concerns were disregarded by both that Council and the planning inspectors at Examination.

When it was originally promoted for development, the land occupied by Northfield Nursery was excluded. The owners of the nursery subsequently **voluntarily and willingly** offered their land up for housing development in the full knowledge that it would result in the loss of their nursery business site.

The nursery owner has actively participated in the promotion of their land through the local planning process and has entered into a development agreement with the adjacent landowner.

### **3. Nursery relocation into the National Park.**

No weight should be given to the fact that the nursery owners own land adjacent to the existing nursery site within the National Park, or to their ownership and occupation of the existing agricultural worker's dwelling.

The owners of the business have chosen to sever the nursery business premises from the remainder of their land holding and so that cannot be used as a reason to relocate into the National Park. To do otherwise would set a significant precedent and would open the flood gates to major development within the National Park contrary to the fundamental principles of its designation.

The information on a search for alternative sites is wholly inadequate and does not comprise a full assessment of alternative site options.

### **4. Agricultural Workers Dwelling**

The applicants point to the need for a residential presence on the site in support of their case that the land they own within the National Park should be accepted for 4000m<sup>2</sup> of horticultural structures and ancillary development.

The agricultural workers dwelling approved in 2013 was approved on appeal on the basis that there was a need for residential accommodation and no existing provision; but its occupation is not tied to Northfield Nursery and could be occupied by anyone provided they can demonstrate compliance with the agricultural and forestry conditions. If there is no demand for agricultural workers accommodation the property should be offered for affordable housing.

### **5. Landscape Impact**

The refusal by the National Park Authority to grant permission for the agricultural workers dwelling referred to above (application ref 13/98287) on the grounds that it would have an unacceptable impact on the visual amenities and landscape character of the countryside of the National Park has been demonstrably justified now the dwelling is built. Its visual prominence over a wide area, including from Ridgeway Lane and public footpaths to the south further within the National Park, can be clearly seen.

At the moment, however, the house is viewed as a prominent but isolated development within the countryside. If this development were approved, the visual impact of the addition of a large footprint of new buildings would be significant and seriously harmful to the landscape character of this part of the National Park.

No Landscape and Visual Impact Assessment has been submitted to assess the impact of the development on the protected landscape of the National Park including the effect of external lighting on dark skies.

### **6. Siting and Layout.**

The red line of the application site has been drawn tightly around the proposed area of building and hard-standing and excludes both the unadopted access to the public highway of Lower Pennington Lane and the remaining area of the field. This is clearly nonsensical and should be corrected and the application site amended to cover the whole of the 2ha field.

If it is not, any screening or landscaping requirements to attempt to mitigate the visual impact of this substantial development will have to be conditioned on land outside the application

site.

If the nursery business is to be contained within the application site as now defined then presumably there will be a need for fencing or other demarcation which would create visually prominent and ugly partitions across large areas of the site.

## **7. Highways impacts.**

The unverified Transport Assessment submitted by the site promoters in support of the allocation of SS6 on behalf of the landowners (including the owners of Northfield Nursery) stated that:

*'As a result of the development, trips associated with Northfield Nursery would no longer be generated reducing the site's net trip generation.'*

A full Transport Assessment should be submitted with this application to show the impact arising from the development together with that from the site allocation on SS6, plus the existing and projected hospice vehicular generation.

PALLS consider that the cumulative impact of the traffic generation would worsen conflict between road users on lanes which have no footways, inadequate lighting and which do not allow two vehicles to pass freely in opposing directions without consequent danger to all road users.

Widening and additional lighting would be urbanising and seriously harmful to the rural character of the National Park.

## **8. Prematurity**

The application is premature pending any grant of planning permission for a housing estate on SS6.

If, despite all the significant concerns raised by this application the National Park Authority are minded to grant planning permission, as a *minimum* a Grampian condition or Section 106 agreement should be imposed to ensure that no development can commence until such time as a contract has been let for housing development in accordance with a detailed planning consent granted on the existing site of the nursery.

## **9. Controls on future expansion/use**

The consultation response from the adjoining authority New Forest District Council (NFDC) is only concerned about the potential for the development to 'morph' into a full retail garden centre. NFDC have never shown any regard or concern for the impact of additional development on the rural lanes or the character of the lanes themselves. However, those concerns are very strongly held by the 700+ members of PALLS and, it is to be hoped, also by the National Park Authority.

We sincerely hope the application will be refused for the reasons we have set out but, if not, a condition of any consent should limit the use of this site to ensure that it is for agricultural or horticultural purposes only.

The site should not be considered as brownfield land and therefore by default a further potential housing site within the National Park.

This proposal is in clear conflict with the twin founding principles of National Park designation and should be rejected.

Furthermore, it does not comply with criteria a), c) or d) of the National Park Local Plan Policy DP50 in terms of functional need and landscape and other impacts. The site may be on the *edge* of the National Park but we do not believe that any part of the National Park should be considered as lower value than another – the principle of landscape protection should be overriding, and policies should be applied consistently across the designated area.

If this application is granted, a clear message will be sent to any landowner: that they can offer their existing site up for development and relocate into the National Park.

Thank you for considering our objection.

Yours sincerely,



Bruce Tindall,  
Chair

cc: Mr Steve Avery, Executive Director Strategy and Planning