



# Friends of Brockenhurst

Reply to: -

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Sent as attachment to Email only

23 January 2017

Duty Officer  
The Planning Inspectorate, Room 3/18  
Temple Quay House  
2 The Square, Temple Quay  
Bristol BS1 6PN

Dear Sir,

**APP/B9506/W/16/3162888 Appeal against Refusal  
WATERSPLASH HOTEL, THE RISE, BROCKENHURST, SO42 7ZP  
Reference New Forest National Park 16/00307 Application: 16/00307 WATERSPLASH HOTEL,  
THE RISE, BROCKENHURST, SO42 7ZP Partial demolition, alterations and extensions to former  
hotel building and construction of 3no. villas to create 24 age restricted apartments with  
communal and support facilities; car parking; cycle parking; landscaping; new vehicle and  
pedestrian access; stopping up of existing vehicle access; removal of swimming pool**

1. Friends of Brockenhurst notes the same applicant's ability to accommodate both age restricted accommodation and another type of accommodation on the Lyndhurst Park Hotel site (NFNPA 16/01000). This conflicts with his assertion that it is a managerial impossibility achieve dual use on this site.
2. The site is within 400Mt of New Forest SPA (NFSPA). The habitat value of NFSPA has declined in the last ten years and the breeding densities of ground and low nesting birds is declining and considerably lower than that of similar protected heathlands. (*Research recommendations relating to impacts of recreation on ground-nesting birds in the New Forest National Park*).
3. Natural England's advice on developments close to the Thames Basin SPA, designated for near identical reasons as NFSPA, is described in Hart DC document *Interim Avoidance Strategy for the Thames Basin Heaths Special Protection Area*. At paragraph 1.5 it states *The duty to consider the possibility of likely significant effects applies to all types of development, but it is residential development that has been most affected. Natural England advise that planning applications resulting in an increase in the number of dwellings within 5 kilometres of the SPA are, without 'avoidance measures', likely to have a significant effect on the SPA within the meaning of the Habitat Regulations. Natural England also advise that within 400 metres of the SPA 'avoidance measures' are unlikely to be effective and net residential development should be avoided.* Similar advice was given for Dorset Heaths SPA. While NE allowed some latitude regarding NFSPA, this was at a time when dwelling provision was projected at 11 pa across the entire Park. FoB contends that this latitude was never intended to allow estates approaching 50 homes to be built within 400 metres.
- 4 It is of note that the loss of employment caused by the closure of Watersplash Hotel and nearby Lyndhurst Park Hotel caused not the least concern locally. This reflects the exceptionally low claimant count in the national park and the need to import labour for work in the catering, accommodation servicing and caring sectors. This generates further "NPPF 115" difficulties e.g. recent application 16/00751 includes 13 units of staff accommodation located immediately adjacent to the NFSPA.
5. The proposal is 24 aged restricted dwellings (C3). The applicant uses the New Forest Strategic Housing Market Assessment of September 2014 to justify its decision to provide age restricted serviced flats. This is a highly simplistic interpolation of the prediction that all of the increase in local population will be above the working age. It is also self fulfilling. The NFSHMA covers the whole district and

The Friends of Brockenhurst was established in 1957 and strives to achieve its main goal of trying to protect, improve and develop the character and amenities of Brockenhurst and surroundings area for the benefit of residents and the wider community.



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conclusions in any particular parish will need to take note of the status quo. In Brockenhurst there are already several properties of this type Homeford House (51 flats), and Latchmoor Court (25 flats) immediately spring to mind.

The recent New Forest SHMA states: -

that out of a total need of 727 to 851 dwellings over 500 should be affordable that house need, **taking into account the aging population**, is: -

1 bedroom	5-10%
2 bedroom	35-40%
3 bedroom	40-45%
4 bedroom	10-15%

that *In areas where the level of housing development might be restricted, particularly within the National Park, consideration might be given to focusing delivering of market housing more towards smaller properties to assist local households to get on the housing ladder; and to support downsizing of older households, releasing stock for other groups. (1.15)*

FoB has extensive local membership and is able to accurately gauge local opinion which in this case accurately reflects the SHMA consideration. Opinion is that if this site is to be used for housing then the right choice would be smaller independent properties, allowing older residents to downsize and young people to join the housing ladder or secure affordable homes.

This development is not of course aimed at local residents. New Forest Association (on behalf of FoB) continues to research the housing type preference of those above working age moving into the National park.. But even here it is clear (eg City of Cardiff - Local Housing Assessment Older Persons report 2015) that unserviced individual dwellings are the most popular choice, not serviced flats and maisonettes.

6. There is current planning permission on this site for one dwelling, some of the development gain from its sale to be used to restore the existing hotel to its former architectural standard. If however the use of the site is to change to residential there must be some community benefit. In principle FoB does not object to the use of this site for residential (other than the national misgivings expressed at 3 above), but there should be no degradation of the conservation area and **there must be some community gain**. Any developer worth his salt can use the viability test to avoid his social responsibilities regarding affordable housing, and developer worth his salt could, given this location and local house prices, build the homes that the village want, to a design suitable for a national park and conservation area and provide a proportion of affordable homes. If he chooses not to then we will stick with what we have and the appeal dismissed.

Yours sincerely,

Graham Baker, NFA Planning Committee  
Registered Charity 260328

Yours sincerely

FoB Planning