



Friends of the New Forest

NEW FOREST ASSOCIATION PLANNING AND TRANSPORT COMMITTEE

Reply to: -

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Sent as attachment to Email only

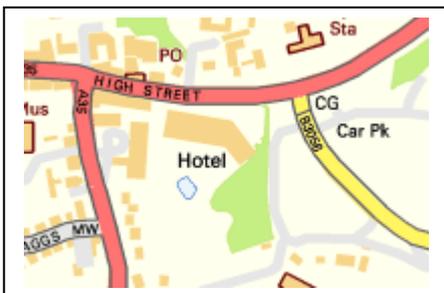
21 January 2017

Clare Ings
New Forest National Park Authority
Lymington Town Hall
Avenue Road
Lymington SO41 9ZG

Dear Clare,

**Application: 16/01000 LYNDHURST PARK HOTEL, 78 HIGH STREET, LYNDHURST, SO43 7NL
Creation of 74 age restricted residential units integrated with communal, wellness and support facilities; 12 no holiday lets; associated car and cycle parking; landscaping; refuse store; substation; alteration of existing vehicular and pedestrian access; demolition of existing hotel and buildings**

1. New Forest Association (NFA) objects to this application.
2. The site is outside the Lyndhurst development boundary and adjacent to the New Forest SPA. A proposal for 86 dwellings is contrary to local plan and conflicts with NPPF 113, 116 and Natural England guidance and should be refused on these grounds. Subsidiary matters such as design are also unsatisfactory and NFA supports other respondents in their criticism and reserves its position to amplify these matters at a later stage.
3. The applicant's "anything goes" attitude stems from an assumption that the site is brownfield and thus a presumption in favour of development exists.



NFA disputes that the whole site would in any circumstances be classed as brownfield. While all of an urban hotel site is brownfield, only a small proportion of the site of a parkland hotel could be classed as previously developed. Lyndhurst Park Hotel falls between these extremes - part previously developed and part having significant ecological value especially given its proximity to land having the highest international designation. NFA would suggest the area marked as woodland on OS maps and derivative maps is not brownfield

In deciding the appeal relating to NF Activity Centre (APP/B9506/W/16/31455), the inspector stated 32, *I note the appellant's comments that the Housing and Planning Act 2016 could be a determinant in establishing the principle of development on pdl. However, no such regulations are currently in force and there is no clear indication that such development would not be restricted in NPs, given that they have the highest status of protection. Consequently, I cannot apportion any meaningful weight to the appellant's argument in this respect.*

4. The proposal is 74 aged restricted dwellings and 12 holiday lets. Both are classed as C3 and comments of the inspector in determining an appeal regarding holiday lets at Woodgeen (APP/B9506/W/16/3143523) is of relevance. He stated *6. Although there has been some discussion within the cases made, it seems to me that tourist accommodation of the type proposed represents new housing. This is because each unit would enjoy all the facilities necessary for day to day living. If permission was granted the occupation would be restricted through conditions to maximum stays and when, during the year, occupation could take place, but this would not affect the use. As such Policy CP12 of the New Forest National Park Local Development Framework Core Strategy and Development Management Policies 2010 (CSDMP) is engaged. This policy restricts new residential development to a limited set of circumstances, none of which are applicable to this case.*

NFA notes the applicant's ability to accommodate both age restricted accommodation and another type of accommodation on the same site. This conflicts with the same applicant's assertion on another site, (Watersplash Hotel Brockenhurst) that it is managerial impossible to achieve dual use.

4. The site is adjacent to 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 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*).

Natural England's advice on developments close to the very similar Thames Basin SPA 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.* While NE allowed some latitude regarding NFSPA, this was at a time when dwelling provision was projected at 11 pa across the entire Park. NFA contends that this latitude was never intended to allow estates approaching 100 homes to be built within 400 metres.

5 It is of note that the loss of employment caused by the closure of 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 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.

6. When carrying out its purposes, the Park Authority has a duty to *seek to foster the economic and social well-being of local communities within the national park*. It is clear from several measures of prosperity that it is achieving the economic element. It is failing on the social element as there is underprovision of affordable homes. The local plan allows housing development on this site only under policy CP11 - affordable exception sites. Any relaxation of that policy, actual or perceived, causes a rise in land prices and must be avoided. (In this case it is believed land price was £65,000 per proposed dwelling).

7. 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 conclusions in any particular parish will need to take note of the status quo.

Other relevant extracts from the NFSHMA are: -

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%

1.15 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.

NFA notes that local opinion accurately reflects this consideration, believing that if this site is to be used for housing then the right choice would be smaller, 2 bedroom properties, allowing young people to join the housing ladder or secure affordable homes, and older people to downsize.

NFA continues to research the housing type preference of those above working age moving into the district, but 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.

Yours sincerely,

A handwritten signature in blue ink that reads "Graham Baker". The signature is written in a cursive style with a large initial 'G'.

Graham Baker, NFA Planning Committee
Registered Charity 260328