

LYNDHURST PARISH COUNCIL

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27 October 2017

Clare Ings
Planning Department
New Forest National Park Authority
Lymington Town Hall
Avenue Road
Lymington
Hampshire
SO41 9Z9

Commenter type: Lyndhurst Parish Council

Dear Ms Ings

Planning Application No. 17/00732 for LYNDHURST PARK HOTEL, 78 HIGH STREET, LYNDHURST, SO43 7NL

“Creation of 75 age restricted residential units integrated with communal, wellness and support facilities; 15 affordable dwellings; associated car and cycle parking; landscaping; refuse store; substation; existing vehicular and pedestrian access; demolition of existing hotel and buildings”.

Lyndhurst Parish Council writes to **OBJECT** to the planning application referenced above.

The application has been assessed by Lyndhurst Parish Council (LPC) against the planning policies set out in the current Local Development Framework (December 2010) and the Government’s National Planning Policy Framework.

It is requested that if the National Park Authority (NPA) concurs with the LPC view any documentation setting out the reasons for OBJECTION should be comprehensive and include ALL of the areas that did not meet the relevant criteria set out in the current Local Development Framework (December 2010) and the Government’s National Planning Policy Framework.

It should be noted that in the foreword of the current New Forest National Part Local Development Framework, the statutory obligation of the National Park is to; “Seek to conserve and enhance the special qualities that make the New Forest the place it is, whilst at the same time ensuring that what development does take place **is focused on catering for the needs of local people**”. It goes on to say that “Major Development proposals should not take place in designated areas, except in exceptional circumstances...” Major

development proposals should be demonstrated to be in the overriding **public** interest before being allowed to proceed.

This site offers a very sensitive location, and an extremely exciting opportunity to enhance the approach to the village of Lyndhurst and create a good quality edge to the forest and to one of the most popular iconic open spaces in the New Forest. It is clear that the scale and design of this development are not in keeping with a village environment, and that the proposal has not changed significantly since the original application (16/01000), in 2016 and shows a distinct lack of understanding of the character and local needs of Lyndhurst. Indeed, rather disappointingly, the applicant has completely ignored the enormous strength of local and wider opposition to their previous application and the detailed reasons for refusal of that scheme. It has failed to make anything other than the substitution of the 14 holiday units with a small amount of affordable housing and a few other non-material changes to the application.

Accordingly, this revised application still contravenes the vast majority of policies as set out by the NPA and National Planning Policy Framework.

The specific objections to the proposed development are as follows:

Development Plan

Designation Outside Defined Village Boundary:

The Proposed Development is outside of the defined village boundary for Lyndhurst and therefore should not be allowed as this will be in breach of the current Local Development Framework (NPA Core Strategy page 37 Paragraph 7.7 / 7.8).

In addition, even if the proposal was within the village boundary it would fall outside of policy CP9 as it has been classed, by the NPA, as a Major Development and not a small-scale development to meet local needs.

The categorisation of the application is at odds with similar applications Pegasus has submitted elsewhere. Pegasus are insisting it is offering an institutional level of care or C2, making it exempt for the need to provide social housing – this is incorrect as the dwellings being proposed are for single and multiple occupancy and are not rented. They are normal residential dwellings, which in turn means that under the National Park Core Strategy Policy CP12 any residential development outside of the defined village boundary should only be affordable / social housing.

Principal Development Plan Policy objections

CP1 Nature Conservation Sites of International Importance

The proposed development sits within 400m of the boundary of a New Forest Special Protection Area (SPA), the proposal has not demonstrated that adequate measures have been put in place to mitigate any potential adverse effects on the ecological integrity of the SPA.

CP2 The Natural Environment:

The proposed development will adversely affect the surrounding conservation area due to the incongruous visual impact against the rural setting. The National Park designation applies which has the highest status of protection in relation to landscape and scenic beauty.

Impact on protected trees on the site. All trees falling under a tree protection order and wildlife within will be adversely impacted by the close proximity of the proposed development. The proposal would result in attrition of landscape with the building being too dominant.

In the original (16/01000) Pegasus Planning Statement, the bat survey identified that 'There was a high level of bat activity recorded... both foraging and / or commuting.' At least 8 species were identified. Although not referred to as such in the report Executive Summary at least three of the species listed appear to be amongst the rarest and most threatened species whose protection and enhancement is a key objective listed under Section 41 of the Natural Environment & Rural Communities Act. It should also be noted that the current application states that the Bat survey is not complete.

The space adjoining the eastern edge of the site is open grazed forest, a wide seasonal pond and a setting for the iconic Bolton's Bench. The proposal presents a series of oversized blocks of flats at three storeys with a foil of retained trees and an attempt to screen at lower levels by restoring a laurel hedge. The building will look institutional especially on winter evenings when the trees provide little cover and the regular grid of three rows of windows is lit up to spoil the backdrop to the open forest.

Special Area of Conservation – adjoining:

This will be fully commented on by Natural England

Special Protection Area – adjoining:

This will be fully commented on by Natural England

Site of Special Scientific Interest – adjoining:

This will be fully commented on by Natural England

Ramsar Site adjoining:

The proposal will have a negative impact on a site of ecological importance (Area between Beaulieu Road and Lyndhurst Park Hotel Boundary) and be in direct conflict with the government's commitment to take the steps necessary to ensure that its ecological character is maintained.

CP6 Pollution:

Due to the relationship with the High Street, the proposal, in effect extends the high street and will bring a closing in affect where it is currently more open. It is also likely to extend the pollution corridor already within the high street, which is already an Air Quality Management Area due to high levels of pollution.

CP7 The Built Environment:

The proposed development does not Conserve and enhance the wealth of individual characteristics that contribute to the local distinctiveness of the built environment of Lyndhurst or the wider New Forest. In addition, one of the National Parks Statutory purposes together with national planning policy (Particularly PPS1 and PPS5) recognises the importance of conserving and enhancing an area's character. This should not allow for the destruction of the culturally important Georgian part of Lyndhurst Park Hotel (the former Glasshayes House), or the erection of a series of overbearing incongruous blocks of flats.

As noted in the original pre-application response letter from the NPA to Pegasus; 'the overall development approach appears to cover most of the space not occupied by trees and mature vegetation with built form or hardstanding. The scheme has the feel of an urban infill proposal rather than one which addresses this sensitive landscape edge to the site and the village'.

CP8 Local Distinctiveness:

The addition of 75 age restricted flats and 15 affordable houses in the current proposal would erode Lyndhurst's local character and would result in increasing the urbanisation of the village. The proposals primary aim is to meet an external demand and Pegasus have failed to demonstrate any local need (CP9) and therefore is not aligned with the local planning policy.

Despite the work put into the design and access statement the designers have clearly misunderstood the context in some fundamental ways. The result is a set of buildings which fail to respond to the context of their siting and are not inspired by what actually characterises Lyndhurst.

The design of this scheme falls very far short of what one would expect for such a development opportunity and would be harmful to the character, vibrancy and quality of Lyndhurst Village. The proposal is fundamentally inappropriate in its context and within the neighbourhood, failing to respond to the character of this area, which is one of transition, the approach and arrival to the village centre and the edge of the open green area of the forest.

The buildings are too large, too bland and laid out in a way that fails to respond to the landscape, to the street and to the spaces around them. Spaces between buildings are not given due consideration and the result is a poor layout demonstrating that ultimately this proposal is one of overdevelopment.

Many smaller dwellings nearby are rich with detail and delight. The proposal on the other hand is unfussy with simple clarity of detail, clean lines and simple forms. This is a contemporary design solution which could work in the right location especially if there is a wide unfussy spacious setting or where there is room to personalise or create garden colour and variety. These buildings however have a setting which is fussy and fragmented, the landscaped areas leave little opportunity for personalisation or colour and variety where it matters, the design subsequently looks inappropriate and out of place in its setting.

CP9 Defined Villages:

This proposal in no way supports local needs and does not strengthen the well-being, identity and sustainability of the rural community. It should be noted that the New Forest has always had a significant local population, sadly these people, who are an essential part of the character of the New Forest, are being forced out by the lack of affordable housing, and this is driven by profit and external demand over local needs and is clearly in breach of policy CP9.

CP11 Affordable Housing:

The National Park's Core Strategy Policy CP11 states "small-scale affordable housing may be permitted as "exceptions" on sites in or adjoining villages to meet the identified needs of local people in these areas. Proposals for exception sites should: "meet a particular local need that cannot be accommodated in any other way;"

This development makes limited provision for local affordable housing (being 15 out of 90 units, or just over 16%); the design of the affordable housing however appears as an afterthought and is segregated from the main development forming a ghetto of dwellings with an enclosed parking area dominating the interior of the proposed courtyard. In addition, the lack of useable garden or open amenity space is equally unacceptable, failing “to secure a good standard of amenity for all existing and future occupants of land and buildings” (NPPF para 17).

Any residential development that sits outside of the defined village boundary should only be permitted if it provides 100% local affordable housing on the development site as required by the Core Strategy Policy CP12 of the Local Plan. New Forest National Park Authority is fully aware that current demand is for local affordable housing to meet the level of need in the area. There is significant evidence that demographics showing an increasing older age profile within the National Park is driven by an **external** demand. Therefore, more must be done to prevent the increase of the age profile by making a significant provision for affordable housing, particularly for younger residents who are being driven out of their local communities by high housing costs.

CP12 New Residential Development:

CP12 states that an additional 220 dwellings will be required within the National Park between 2006 and 2026. The proposed scheme represents, in one development, ~39% of the total new housing across the whole of the National Park over a twenty-year period (7.8 years' worth of development).

The proposal clearly does not adhere to the Local Plan that states “new residential development will be permitted within the National Park to maintain the vitality of local communities and support local services, where the proposal is”:

- Within the defined New Forest villages set out in CP9; or
- A replacement of an existing dwelling in accordance with Policy DP10; or
- An extension to an existing dwelling in accordance with Policy DP11; or
- An agricultural or forestry workers dwelling in accordance with Policy DP13; or
- Affordable housing for local needs in accordance with CP11.

The proposal by its very nature will have a material impact on local support services. The doctor's surgery is currently overstretched, with many local residents having to wait weeks to gain an appointment. In addition, the local pre and primary school are currently taking in pupils from outside of their catchment due to lack of children. The proposal will further increase this problem and may eventually lead to the closure of the school which in turn will reduce young families desire to live in the area and affect the vibrant community spirit in the village.

There is significant evidence that demographics show an increasing older age profile within Lyndhurst and the wider New Forest National Park. Statistics taken from the NFDC website from 2015 show that the population of Lyndhurst was 3292 of which 662 were over 70 (20.7%). It is not unreasonable to expect an increase of ~150 over 70's from this development making 25% of the population over 70.

The proposal sits outside of the village boundary and does not include any form of facility that is for community use that could potentially drive community spirit. It should also be noted that in local and national press the developer seeks to attract “high end” home owners. This shows the developer has no intention of housing

local people intent upon “downsizing” when they retire thus releasing local housing stock. As at October 2017, the average price of properties in the New Forest stood at £418,000 (Source: www.zoopla.com) and Pegasus has not demonstrated how it can meaningfully show that the likely prices will allow people to downsize, particularly given prices of its other developments.

The Housing Needs Report, prepared for Pegasus Life, explores in considerable detail the increasing numbers of older people in Lyndhurst. However, it fails to recognise that one of the reasons for this is the lack of affordable housing and the resulting difficulty young people and new households have in remaining in the village as a result of high prices. This is inexorably eroding the balance and therefore vibrancy of the community. Pegasus Life claims (PS para 6.28) that “there is a significant pressure upon sites that come forward for development to reflect the demographic changes of the community and therefore provide homes suitable for older people.” In fact, providing more such homes for older people only helps to exacerbate the demographic imbalance and not meet the needs of local people.

In addition, The Boltons development has 23 residential units of 1 and 2 bedroom retirement homes, many remain unsold since December 2015, despite prices of most units being in the range of £150,000 to £300,000 and this clearly shows there is no local need for this type of development, even where the values would allow older people to downsize.

CP15 Existing Employment Sites:

The proposal is in breach of the policy as no employment will be retained on site.

CP16 Tourism Development:

The loss of the hotel, both in terms of its function (as serviced accommodation) and its associated heritage will impact tourism. No clear evidence has been put forward to demonstrate there is no demand for at least part of the site to continue to operate as a hotel, nor has the building been marketed as a hotel. At the time Pegasus purchased the hotel, they did so in competition with other hotel operators, but ultimately succeeded in purchasing the property by paying significantly above market price of the hotel as a going concern, in order to secure the site. As well as the loss of local jobs there is also the loss of tourist income for existing Lyndhurst and wider New Forest businesses.

Pegasus have stated, in their planning statement that the New Forest currently has 2,447 serviced bedrooms and that the loss of 60 bedrooms from the hotel only equates to 3%, this is clearly misleading as the impact to Lyndhurst would be significantly higher.

CP19 Access:

Traffic, access and parking. The proposal does not include sufficient parking and so the overspill will be into the adjoining forest and village car parks; this will prevent tourists accessing this part of the forest.

Only 3 visitor spaces have been allocated for visitors, tradesmen and an array of domestic care workers. Based on the mix of 1, 2 and 3 bedroom apartments the development should have in the region of 150 spaces based on NPA policy guidelines rather than the 108 proposed in the application. The NPA Development Standards Supplementary Planning Document (SPD) 2012 states that for new residential schemes, the minimum parking standards are as follows:

- 1 bedroom units 1 space per unit
- 2-3 bedroom units 2 spaces per unit

The fragmented nature of car parking, with residents unable to view their own car and with spaces squeezed into any gaps available adjacent to buildings, are not ergonomic and would be inconvenient, the design layout is clearly driven by overdevelopment.

In addition, the amenity space around each block is somewhat random, based upon tree protection areas with buildings inserted everywhere there is space between these. The open spaces are contrived from that land which is left over after the car parking has been added. Considering also that the footpaths are often poorly considered leaving odd shapes and ignoring desire lines, the layout is poorly designed.

DP1 General Development Principles:

The extent and scale of the proposed development. The volume of the buildings and the residential density is completely out of keeping with what would be appropriate in a village. There are many elements of the development which are poorly designed, again this is as a result of over development

The Local Plan states that only appropriate small scale housing development to meet the needs of the local communities will be supported. No evidence has been submitted to show why this application should be an exception to the Local Plan.

The proposal does not sit separate to the High Street and the frontage space does not act as an important buffer that promotes a gradual change from rural to urban. This does not create any uplifting termination to the vista on arrival at the village. It does not enhance the rural edge and does not enhance the street frontage with limited greenery or delightful and rich buildings.

In addition, when looking eastwards from the high street, the proposed High Street frontage would dominate the view and destroy the current transition from the built environment to rural.

When viewed from the rear gardens of properties situated on Gosport Lane to the West of the proposed development, the blocks of flats would be incongruous and overbearing in nature.

Whereas bland buildings can be attractive if set within good spaces which support the architectural quality or alternatively if they are enhanced with the seasonal colour of planting and the opportunity to personalise, the Southampton Road frontage falls between stalls by offering a narrowing wedge of nominal front gardens instead of the more appropriate large set-backs and settings evident from the cottages and gardens opposite.

DP3 Open Space:

Policy DP3 requires that development should either provide for the enhancement of existing open space and amenity areas, or provide on-site open space to a set standard. In this proposal, the spaces around the site would be entirely private to the occupants.

DP6 Design Principles:

Larger houses on the approach to the village are rich with articulated rooflines, gardens, hedgerows, gaps and occasionally a feature to celebrate a corner or highlight of the building. The proposal responds with long roof planes of terraced houses or flatted blocks with tedious, rhythm and repetition within the fenestration and building facades. There are few gaps, little in the way of gardens and no discernible highlights on the buildings. Certainly no celebration of the corner where the designer identifies a key vista on the approach to Lyndhurst.

These buildings are bland and although they are proposed with a range of facing materials the development as a whole lacks the richness which a location of this sensitivity requires. The proposed buildings are not in keeping with the local vernacular, the proposed design is overbearing and suburban in style and not at all in keeping with the rich heritage of Lyndhurst nor the unique style of the original parts of Glasshayes House.

The designer has only looked inward towards the village centre for inspiration, failing to take due notice of the defining qualities of the street and the open countryside adjacent to where the site actually lies. Cottages set back behind, and within, garden settings are a 'defining element'. The proposal offers no garden fronts to the affordable buildings with front doors opening directly onto the busy pavement next to the main A35 as it enters the village.

A space is provided for some existing trees but rather than creating a positive green space this is more a way of retaining trees merely to ensure there is some softening of the impact of the terraces and to take some of the scale off the end gable of the largest block.

If these buildings are poor enough to warrant screening etc. then they are not good enough for this location. It should be noted that the Planning Inspectors comments relating to the Cedar Mount Proposal in Lyndhurst stated, that "it is not correct to rely on vegetation for screening. A harmful design cannot be hidden by vegetation".

National Planning Policy Framework Objections

Sec 3 Supporting a prosperous rural economy:

It is not accepted that the further age restricted accommodation will enhance or support a prosperous diverse rural economy.

Sec 6 Delivering a wide choice of high quality homes:

Clearly as a primarily age restricted community it does not deliver a wide choice of housing options and is therefore outside of policy.

Sec 11 Conserving and enhancing the natural environment:

There are few opportunities for the tree stock to be perpetuated for the future in a way that is meaningful within the development and bizarrely the only aspect of the site's long heritage that is to remain and grace this proposal is the re-establishment of a laurel hedge along the forest front a feature appropriate to a large hotel or mansion of long standing, but in this case, merely a means of screening several blocks of flats.

Sec 12 Conserving and enhancing the historic environment:

It is interesting to note that the Pegasus Life Philosophy is one where, “we are always inspired by the land we work on: it history, its surroundings and its future”.

The proposal however does not fully consider the architectural heritage of the site and seeks to demolish all of the historic structure. It fails, to recognise the juxtaposition of the original part of the hotel (Glasshayes) set opposite the iconic view of Bolton’s Bench. Loss of the earlier parts of the building would be to the great detriment of the visual impact of the entrance into Lyndhurst. It would also sever another connection with the history and heritage of the village which, through its connections with notable figures of the past, played such an important part in the life of the country.

It should be noted that the older parts of the building (Glass Hayes House) have been classed as a Non-Designated Heritage Asset (NDHA) by the applicant in their Heritage Assessment. This classification status has recently been used to refuse the demolition of a timber framed barn by the New Forest National Park, at Greencare’s in Wellands Road. With this precedent now set, the Planning Inspectorate has a duty of care, as set out in their statutory obligations to protect the original structure of Glass Hayes House.

The NDHA as noted in Greencare’s APP/B9506/W/17/3167885 is of far less importance than the Lyndhurst Park Hotel and any inspector would conclude that the complete removal of the existing structure would be harmful.

It is clear the proposed development contravenes Section 12 of the National Planning Policy Framework regarding conserving and enhancing the historic environment.

In the pre-application response letter from the National Park Planning Authority, it states that, ‘Siting within the Lyndhurst Conservation Area. There has been considerable interest in the historic significance of the Hotel, in terms of its architecture; there is a historic core which contains some interesting elevations and historic rooms and features (e.g. staircase) which remain fairly intact and also its social history. It is acknowledged that some later changes to the hotel have eroded some of its visual presence within the street scene. However, its character as set out previously relies heavily on its position within the site and the verdant landscape setting which has defined the site from its early evolution.’ The proposed demolition of the Georgian part of Lyndhurst Park Hotel would go against one of the core statutory purposes of the NPA and the National Planning strategy of protecting our cultural heritage and historic environment.

CLOSING COMMENTS

The proposal under consideration is not materially different from the original application (16/01000) and it is clear that the developer has disregarded the vast array of Local and National planning policies as detailed in this refusal or taken note of the previous refusal reasons from the LPA. The developer has also failed to listen to the overwhelming objections from local residents.

Lyndhurst Parish Council feels that as this site sits in a very sensitive location in the Capital of the New Forest; next to one of its most popular and landmark open spaces. The proposal falls far short of what would be appropriate for this location.

The scale and design of this development is not in keeping with a village environment. The development is clearly urban in design with significant overdevelopment of the site. The proposal shows a distinct lack of understanding of the character and local needs of Lyndhurst.

The application has been assessed by Lyndhurst Parish Council (LPC) against the planning policies set out in the current Local Development Framework (December 2010) and the Government's National Planning Policy Framework. The proposed application contravenes the vast majority of policies as set out by the NPA and National Planning Policy Framework and hence the proposal has been rejected.

As stated previously. It is requested that if the National Park Authority (NPA) concurs with the LPC view any documentation setting out the reasons for refusal should be comprehensive and include ALL of the areas that did not meet the relevant criteria set out in the current Local Development Framework (December 2010) and the Government's National Planning Policy Framework.

Yours sincerely

Margaret Weston (Mrs)
Clerk and Reponsible Financial Officer