

**NEW FOREST NATIONAL PARK  
LOCAL PLAN 2016-2036  
EXAMINATION OF SUBMISSION VERSION**

**HEARING STATEMENT**

**MATTER 6: PROTECTING AND ENHANCING THE  
HISTORIC AND BUILT ENVIRONMENT**

**MATTER 7: HOUSING POLICIES**

**MATTER 10: HOUSING SITE ALLOCATIONS**

**ON BEHALF OF PEGASUSLIFE LTD**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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## **1. INTRODUCTION**

- 1.1 This Hearing Statement has been prepared by Pegasus Group ('Pegasus') on behalf of PegasusLife Ltd in response to the New Forest Local Plan (NFLP) 2016-2036. Pegasus, acting on behalf of their client, previously made representations on the plan previously, submitting reps on 27<sup>th</sup> February 2018.
- 1.2 A copy of these representations is provided at Appendix 1.

### **APPENDIX 1 – FEBRUARY 2018 REPRESENTATIONS**

- 1.3 Pegasus requested that they be permitted to attend the hearing in relation to the following Matters:
- Matter 6: Protecting and Enhancing the Historic and Built Environment;
  - Matter 7: Housing Policies; and
  - Matter 10: Housing Site Allocations, specifically Policy SP23: Land at the former Lyndhurst Hotel.
- 1.4 Pegasus feel that their attendance is important in order to clarify their concerns and suggestions made within their representations and consider that these are fundamental to the aforementioned Matters and the soundness of the Plan.
- 1.5 This is elaborated on in the following chapters.

## 2. BACKGROUND

- 2.1 At the outset we can confirm that PegasusLife is supportive in principle of Policy SP23: Land at the former Lyndhurst Park Hotel (hereafter referred to as LP Hotel) which allocates the site for mixed use development. However, there are a small number of detailed issues which need to be considered and, in our view, amended in order to ensure the 'soundness' of the policy.

### Development Management

- 2.2 PegasusLife Ltd owns the freehold of the LP Hotel and purchased the site after its closure in 2015. The site has been vacant since.
- 2.3 A 'Call for Sites' form was submitted for the site as part of the New Forest National Park Authority's (NFNPA) call for sites in September 2015. The submission confirmed that in the land owner's opinion, an expert retirement housing provider, that the site was suitable for a C2 use.
- 2.4 PegasusLife brought forward proposals during 2016 for 74 new retirement homes and 12 two-bed holiday lets.
- 2.5 Community consultation associated with these proposals (September 2016) received a mixed response, particularly in relation to potential retail and holiday lets as part of a mixed-use proposal. This is set out in the Statement of Community Engagement (November 2016) which accompanied the 2016 planning application for the development as described above (16/01000).
- 2.6 The 2016 application was refused under delegated powers. The first reason for refusal levelled a criticism of the scheme that it made no affordable housing provision in compensation for the loss of the hotel use.

## **APPENDIX 2 – 2016 APPLICATION DECISION NOTICE**

- 2.7 A revised application (17/00732) was submitted in August 2017. The description of development had been adjusted to increase the number of age restricted units by 1 as well as providing 15 no. affordable dwellings. The affordable units were provided in direct response to reason for refusal 1 on the 2016 decision.

- 2.8 This second application was refused in December 2017. Reason for refusal 1 has altered slightly to now concentrate solely on the fact that it is proposed residential development beyond a defined settlement boundary.

### **APPENDIX 3 – 2017 APPLICATION DECISION NOTICE**

- 2.9 The 2017 decision is the subject of an appeal which is being dealt with by way of an Inquiry scheduled for January 2019.

#### Planning Policy

- 2.10 From a policy perspective, the Consultation Draft version of the NFLP (September 2016) identified the LP Hotel for a mixed-use allocation (draft Policy 22) including around 30 dwellings, retail and employment generating uses.
- 2.11 By Regulation 19 (January 2018), the allocation had evolved to allow for a mixed-use development including tourism and residential (around 50 dwellings). As noted above, Pegasus made representations to this version of the Plan.
- 2.12 No amendments to the policy were made prior to the submission of the Plan for examination.

### **3. MATTER 6: PROTECTING AND ENHANCING THE HISTORIC AND BUILT ENVIRONMENT**

- 3.1 We object to the wording of the draft policy SP16: The Historic and Built Environment.
- 3.2 The structure of part a) of the policy misinterprets the NPPF's approach toward assessing significance and balancing benefits against any negative impact on designated and non-designated heritage assets.
- 3.3 The existing Core Strategy policy C7 is flawed in a similar fashion. At paragraph 13 of the Watersplash appeal decision (ref 3162888) the Inspector stated:
- "CS Policy CP7 requires development to protect, maintain and enhance locally important features of the built environment. This policy pre-dates the National Planning Policy Framework (the Framework) and does not reflect the approach of weighing any harm to a designated heritage asset against the public benefits of the proposed development, set out at paragraph 134. Therefore, I shall afford more weight to the Framework..."*
- 3.4 Therefore, it is clear that policy SP16 should reflect the NPPF, including paragraph 196. It is suggested that criterion (iv) of part a) of the policy should be set out separately to reflect the correct policy mechanism and interpretation of paragraph 196 and s.39 of the Act (2004).

#### 4. MATTER 7: HOUSING POLICIES

- 4.1 With regard to Matter 7: Housing Policies we have concerns in relation to policies SP20: Specialist housing for Older People and SP21: Size of new dwellings.

*SP20: Specialist housing for Older People*

- 4.2 The provision of specialist housing for older people is firmly on the Government's agenda with plans to invest around £76million annually for the next three years in new homes specifically designed for those who are frail, elderly or suffering from disabilities.

- 4.3 Caroline Dinenage, care minister, recently said:

*"Far too often, older people who could have stayed at home for longer are ending up in hospital or residential care. We must do much more to ensure the quality of our housing keeps up with ever-evolving health needs."*

And

*"We need to.....help more people live in the community for longer and keep the pressure off our health and social care system – something we all want to see."*

- 4.4 As a specialist provider of housing for older people PegasusLife welcomes a policy that seeks to address the need for housing for older people. This is reflected within paragraph 61 of the NPPF2 which requires the housing needs of older people to be factored into the formulation of planning policies.
- 4.5 The New Forest Strategic Housing Area Assessment (2014) highlights that the age profile of the population within the National Park is significantly skewed to the older age brackets when compared to the rest of the Hampshire County and the wider South East.
- 4.6 The evidence also suggests that the population aged 60 or over has increased by over 24% during the period 2002-2012 whilst almost all over age groups up to 59 have decreased over the same period. Evidence suggests that this trend is likely to continue over the plan period.

4.7 It is clear, therefore, that meeting the needs of an ageing population is an acute problem for the National Park and we believe a problem which requires a more flexible approach than is currently proposed, particularly where there are a limited number of available sites (Paragraph 7.12 of the NFLP).

4.8 Turning to the detail wording of Policy SP20 we suggest that three amendments are necessary, in order to increase flexibility:

- Linkages to housing allocations;
- Beyond defined Villages; and
- Restrictions to occupation.

*Linkages to housing allocations*

4.9 We have highlighted the scale of the ageing population issue which the NFNP faces it is therefore surprising that given this no specific retirement housing site has been proposed for allocation.

4.10 We assume this is in part due to the limited availability of sites which the NFNPA has considered to be suitable.

4.11 It is reasonable to assume that as allocations they are sustainably located sites at suitable settlements. As such they would be appropriate locations for specialist accommodation.

4.12 In the absence of specific allocations, we consider that SP20 could easily be amended to also support specialists housing for older people on allocated sites.

*Beyond Defined Villages*

4.13 As currently worded SP20 allows for specialist housing within the four defined villages. However, beyond these settlements only extensions to existing accommodation will be allowed. Any affordable housing requirements would be controlled via the allocation policy wording.

4.14 The LP Hotel site is the largest brownfield site within the NFNP and is located beyond the current defined settlement boundary. We would suggest that upon the adoption of the allocation the NFNP should amend the settlement boundary to include the LP Hotel site.



- 4.15 As discussed above, there is a rapidly ageing population within the National Park. Page 10 of the NFNPA's Housing Topic Paper (January 2018) also identifies high levels of under occupation of homes and suggests that policies could be formulated to ensure that appropriate types of housing are available i.e. moving away from the skew to larger detached properties.
- 4.16 Evidence prepared by Contact Consulting which was submitted in support of the 2017 application, Paragraph 5.6 states:

*"In 2016 those sixty-five years or over already made up 29.92% of the total population of Lyndhurst, compared with 27.62% for whole of the New Forest District Council area in 2015. The disparity is maintained in the 2031 figure for Lyndhurst when those sixty-five years of age and over will make up 38.32% of the total population compared with the 2030 figure for the New Forest District Council area of 33.86%".*

#### **APPENDIX 4 – HOUSING NEEDS REPORT**

- 4.17 We are also aware of the appeal decision for older persons housing at the Watersplash site in Brockenhurst (appeal ref 3162888, April 2017) where a similar high proportion of over sixty-fives is present.
- 4.18 Paragraph 37 of the Planning Practice Guidance states:
- "Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people including residential institutions in Use Class C2, against their housing requirement."*
- 4.19 We accept that suitable opportunities beyond the Defined Villages may be more limited but precluding them in totality is too inflexible. We suggest a more flexible approach, one based on defined local need could be incorporated much in the same way as is set out by Policy SP3 for general market housing.

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*Restrictions to Occupation*

- 4.20 We object strongly to the second paragraph of SP20, which seeks to restrict the occupation of specialist housing for older people to those who have lived in the Park for a minimum of 5 years. We consider there is no sound planning justification for such a restriction.
- 4.21 We understand the authority's desire that the local community should benefit from such developments. However, the policy as currently worded discriminates against older people who do not currently live in the Park.
- 4.22 In addition, there is the issue of affordability. Paragraph 1.6 of the Housing Topic paper (January 2018) confirms that the average house price in the New Forest was £560,000.
- 4.23 Given the high percentage of older people who own their homes (80% of dwellings within the National Park are owner occupied), it is reasonable to conclude that there is a significant pool of people within the Park who could move to specialist older person housing. In so doing, it would free up existing larger detached properties who look to move to smaller more suitable accommodation.
- 4.24 It seems to be basic economics that if more suitable alternatives were available then a greater number of older people would choose to down size and thus increase the number of properties available for the wider market a point shared by the National Housing Federation.
- 4.25 The NFNPA has produced no substantive evidence to justify such a restrictive policy provision, which seeks to place a restriction on an otherwise free market. There is an existing significantly older population within the New Forest and it is unclear how many of these would already qualify to move into such accommodation.
- 4.26 We consider that the last paragraph of the policy should be deleted and the NFNPA should focus instead on creating a flexible environment which enables, rather than disables, specialist housing for older people to be delivered.
- 4.27 Accordingly, we suggest the policy should be amended as follows:

*"Proposals which address an identified local need or requirement  
for specialist housing for older people will be permitted within the*

*Defined Villages of Ashurst, Brockenhurst, Lyndhurst and Sway  
or on allocated sites.*

*Outside the Defined Villages, extensions to existing specialist  
housing for older people will be permitted providing this can be  
achieved in a satisfactory manner within the existing site and  
without having a harmful impact on the locality. New facilities will  
be granted in exceptional circumstances where there is proven  
local need.*

**5. MATTER 10: POLICY SP23 - LAND AT THE FORMER LYNDHURST PARK HOTEL**

5.1 At the outset we can confirm that PegasusLife is supportive in principle of Policy SP23: Land at the former Lyndhurst Park Hotel (hereafter referred to as LP Hotel) which allocates the site for mixed use development. However, there are a small number of detailed considerations which need to be considered and, in our view, amended in order to ensure the 'soundness' of the policy.

5.2 For the sake of clarity, the current wording is provided in italics and our position is set out below.

*Land at the former Lyndhurst Park Hotel is allocated for a mixed-use development including tourism and residential.*

5.3 As the Local Plan makes clear (bullet 7.23) the village of Lyndhurst has the "widest range of services and facilities" of the settlements within the NFNP. It further sets out (7.24) that the village boundary was established in the 1980's and had not been amended since this date.

5.4 The recent review identified the LP Hotel as one of the largest brownfield sites within the NFNP. The effective re-use of brownfield land is actively encouraged within paragraph 118 of the NPPF2 being of particular relevance.

5.5 Paragraph 118 notes at bullet c) that substantial weight should be given to using suitable brownfield land within settlements for homes and other **identified needs** (Pegasus's emphasis) and goes on to support appropriate opportunities to re-use derelict land.

5.6 Moreover, bullet d) states that "support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained."

5.7 The NFNP is clearly an area where land supply is constrained by virtue of it being a nationally protected landscape. Given the high proportion of land covered by a range of landscape and habitat designations has resulted in the NFNP being unable to meet its housing need by its own admission.

5.8 As set out in the Statement of Common Ground between the NFNP and the New Forest District Council, the NFNP will under provide by approximately 460 dwellings

over the plan period. Such a shortfall equates to 37% of its established housing need.

- 5.9 With this spatial context in mind it is all the more crucial that the NFNP should seek to maximise the suitable sites that it does benefit from. We would suggest that the LP Hotel site falls firmly within this category by virtue of it being a sustainably located brownfield land on the edge of one of the larger settlements.
- 5.10 We would therefore suggest that the proposed allocation should seek to maximise the number of residential units which can be delivered on this site.
- 5.11 Our allied concern is regarding the absence of any evidence produced by the NFNP to justify why the mixed-use proposals should contain a tourism related element. On the contrary our clients have significant evidence which points in the opposite direction.
- 5.12 The history of the Hotel is of interest here which is set out in greater detail within the Tourism Impact Review (Morton Associates May 2016). The site began life as a residence in 1897 before being turned into a hotel, called 'The Grand'. The site was sold to a Mr Cousins in 1970 who renamed it the Lyndhurst Park Hotel in 1970. Mr Cousins went on to acquire several other hotels as part of the Forestdale Hotels group in 1978.

## **APPENDIX 5 – TOURISM IMPACT REVIEW**

- 5.13 By 2010 the Forestdale group remained in private ownership and consisted of 18 no. 3-star properties across England. In December 2010 the Forestdale group was acquired by Akkeron Hotels. Akkeron Hotels had in 2009 acquired the 8 no. Folio Hotel group out of administration (i.e. experienced provider). It is understood that Forestdale Hotels Ltd was struggling both financially and operationally at the time of the sale.
- 5.14 By March 2014, Forestdale Hotels Ltd, a subsidiary of Akkeron, was placed into administration. In the same month 14 of the portfolio of hotels including the LP Hotel were sold to St James's Hotels.
- 5.15 8 of the 14 hotels are still traded by the St James's Hotels company. The other six were disposed of. Of these 6, 3 have ceased trading completely and the other three have continued to trade but under new operators (including Premier Inn).

- 5.16 The implication of this evidence being that a number of hotel operators have either owned or have looked at the prospect of the Lyndhurst Park Hotel and have all chosen to not operate the site as a hotel going forward.
- 5.17 Such a conclusion is further re-enforced when consideration is given to the Property Condition Report (Simpson Hilder Associates, March 2015) which describes the existing building as being an extremely tired building which has come to the end of its functional and economic life *"by virtue of the changes in consumer requirements and the lack of investment made over the past 20 years."* It is understood that the viability report considers the cost of rehabilitating the hotel are estimated at some £9.65m compared to a market value of circa £4.9m on completion, resulting in a viability gap of £4.75m. It is reasonable to conclude that the site is no longer viable for a tourism use.
- 5.18 We accept that tourism is a key part of the economy in the New Forest. The main strength of serviced accommodation within the market appears to be in the self-catering sector which more directly appeals to those visitors who wish to take enjoyment from the natural environment. Shorter one-night stays are likely to be drawn to nearby settlements of Bournemouth and Southampton which have a wider range of facilities and attractions.
- 5.19 It is our view that there is no evidence to justify a mixed-use scheme which incorporates some form of tourism accommodation, other than one borne out of nostalgic sentiment. Given the inherent housing delivery shortfall, we would suggest the maximisation of the site for residential purposes would be more beneficial for all.

*"The site has potential for around 50 dwellings alongside the retention of the historic elements of the existing building. Residential development on the site should secure the future conservation of the heritage assets on the site."*

- 5.20 Given the spatial planning context discussed above, there is a clear and compelling justification to seek to maximise the residential development opportunity that this site presents. Accordingly, we consider that the first part of the policy wording should be amended to read as follows:

***The site should deliver a minimum of 50 residential dwellings (C2 or C3 uses).***

*"Alongside the retention of the historic elements of the existing building."*

- 5.21 A Heritage Assessment was submitted with the 2017 application and this makes a detailed assessment of the site.
- 5.22 The site relates to a former residence known as Glasshayes. This was converted, during the 1890's to a hotel, which was first named 'The Grand' and then subsequently 'Lyndhurst Park Hotel'. The building was the subject of a large number of alterations and extensions and the removal of a large degree of the original historic fabric.
- 5.23 It is important to note that the structure is not a Listed Building, nor is it classified by the NFPA as a building of local historic interest. Even if NFPA were minded to add the building to their 'Local List' then it would remain a non-designated heritage asset within the terms of the NPPF.
- 5.24 The site is however located within the Lyndhurst Conservation Area which was first designated in 1977 and the boundary reviewed in 1999.
- 5.25 Indeed, Historic England have considered and confirmed (as recently as October 2017) that the building does not meet the criteria for statutory designation (Listing).
- 5.26 As set out within the submitted Heritage Statement, the building has been significantly altered during its time as a hotel. The building today comprises individual components of varying dates and styles. Much of the decorative detailing which was previously within the building has been removed and more unsympathetic elements have been added.
- 5.27 We consider that the former hotel building represents a non-designated heritage asset of minor significance. This value is limited by later development within the site and that the historic fabric has been compromised by later alterations and extensions.
- 5.28 We further consider that the former hotel building is not considered to make a contribution to the overall heritage significance of the Conservation Area.
- 5.29 We would also draw attention to the submitted Financial Viability Assessment, which based on the current proposed scheme (subject of an appeal) which sees the

demolition of the building produces a developer's profit below what would be considered appropriate for this type of development whilst adopting an appropriate site value for the landowner.

5.30 In conclusion, we therefore consider there is no historic merit in retaining the current building, nor is there any likelihood that a tourism re-use of the building can be viably provided. Indeed, a residential development also results in a developer profit below what would be considered appropriate.

5.31 It is our view that the NFNPA's intentions run counter to the NPPF, specifically Paragraphs 117 and 118 given the housing context within the New Forest.

*"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses....in a way that makes as much use as possible of previously-developed or 'brownfield land.'"*

And

*"promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively." (our emphasis).*

5.32 The site should therefore not be required to deliver any tourism related use.

5.33 Turning to the detailed requirements of the policies:

a) *The site must be redeveloped in a comprehensive manner:*

5.34 We do not disagree with this statement given its position within a Conservation Area.

*b) The historic elements of the existing hotel building must be retained and could be used for a range of uses, including tourism and residential use. A detailed heritage assessment will be required to justify any proposals which harmed their retention.*

5.35 We consider that the historic elements of the existing hotel are limited and are not worthy of retention and we have produced detailed evidence to this effect.



5.36 Even in the absence of this overwhelming evidence which is in front of the NFNPA, the policy should not be worded in such an inflexible way. As a minimum we consider that reference to “*must*” should be removed and flexibility introduced.

5.37 Clearly if a scheme could come forward which could be viably delivered which saw the existing building and any remaining historic features retained then this would be the optimal solution.

5.38 However, that isn’t the case and the policy must be amended to cover off that scenario which in our opinion is the most likely.

*c) The design and scale of the redevelopment of the site must conserve and enhance the character of this part of the Lyndhurst Conservation Area.*

5.39 We object again to the word “*must*” within this statement much in the same way to criterion b) as identified above as it would direct the decision maker to refuse a planning application if **any** harm resulted to the Conservation Area.

5.40 This is not the tests as set out in paragraphs 195 and 196 of the NPPF which requires a decision maker to balance public benefits against any resulting harm to a designated heritage asset (e.g Conservation Area). Unsurprisingly, national policy reflects the legal test under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which applies a weighting in the consideration of any planning application within a conservation area to the preservation or enhancement of the character or appearance of the conservation area, rather than applying a blanket prohibition to any form of harm.

5.41 Therefore, the wording of criterion (c) should be re-drafted to accord with national planning guidance.

*d) Redevelopment proposals must retain the important trees on the site that contribute to the open verdant setting and the site’s edge-of-village location.*

5.42 We consider that the word “*must*” be changed to ‘should’. It is not clear which trees the policy considers to be important and some flexibility should be retained if development is to be comprehensive in line with the wider aspirations.

*e) Adequate parking provision must be made on-site.*

5.43 We have no objection to criterion e).

*f) Proposals for C3 residential use must provide on-site affordable housing for local people in housing need as close to the Authorities target of 50% affordable housing as is viable. Viability will be demonstrated.*

5.44 We have no comments to make, though we would note that the NFNPA's Housing Topic Paper (Paragraph 3.16) notes that Extra Care schemes were not viable where tests with a 50% affordable housing requirement. Schemes only became viable at around an affordable provision of 20-30%.

*g) All of the dwellings to a maximum total internal habitable floor area of 100 square metres.*

5.45 We acknowledge that there is currently a high proportion of larger detached houses in the National Park but consider that the draft policy should take a more positive approach toward creating a more varied mix of dwellings.

5.46 Simply limiting new dwellings to a maximum of 100 sqm/3 bedrooms could result in unexpected consequences, for example:

- Planning applications could come forward that propose only the maximum 100 sqm 3 bedroom dwellings and no smaller 1 and 2 bed dwellings;
- Site specific conditions suggest that a different mix of dwellings would be preferable. For example, where brownfield land cannot be maximised, or where infill plots amongst larger scale properties cannot be delivered because a smaller 100 sqm dwelling would be out of character with the existing character; and
- An opportunity is missed to provide, for example, a 4 bedroom affordable house that a family could otherwise have occupied.

5.47 Using Local Plans to signal for the market what is required across housing tenures and proactively engaging with developers supports the delivery of well targeted and considered housing proposals.

5.48 We therefore suggest that the policy be re-drafted so as to encourage a suitable mix of properties that addresses the shortage of 1 to 3 bedroom dwellings, whilst not preventing entirely the development of larger family homes.

5.49 This also repeats the content of other policies within the Local Plan and is therefore not needed to be repeated.

*h) Any proposals for C2 use (i.e. where no affordable housing for local people would be provided) must be accompanied by a legal agreement requiring the occupancy to be limited to those with a local connection.*

5.50 We object to this in line with our comments on Matter 7: Housing Policies set out in Section 4 above.

*i) Development proposals must ensure future access to existing water supply infrastructure for maintenance and upsizing purposes.*

5.51 We question why this is required and what evidence there is to substantiate this request.

*j) Development proposals must incorporate measures to mitigate potential significant urban edge impacts on adjacent protected habitats.*

5.52 We consider this should be deleted as protected habitats are material considerations and their protection are controlled via policies SP5 and SP6.

5.53 Accordingly, we consider the policy must be amended as follows in order for it to be sound in accordance with the provisions of the NPPF:

**Policy SP23- Land at the former Lyndhurst Park Hotel, Lyndhurst**

*Land at the former Lyndhurst Park Hotel is allocated for residential development (either C2 or C3). The site should deliver a minimum of 50 dwellings.*

*Detailed proposals for the site should take account of the following site specific considerations:*

- a) The site must be redeveloped in a comprehensive manner;*
- b) If possible historic elements of the existing hotel building should be retained. Where this is not possible a detailed heritage assessment will be required to justify any loss, including complete demolition;*
- c) The design and scale of redevelopment of the site should conserve and enhance the character of this part of the Lyndhurst Conservation Area;*
- d) Redevelopment proposals should retain the important trees on the site that contribute to the open verdant setting and the sites edge of village location;*
- e) Adequate parking provision must be made on-site;*
- f) Proposals for C3 residential use should provide on-site affordable housing for local people in housing need as close to the Authority's target of 50% affordable housing as is viable. Any provision below this target must be demonstrated through an open book viability appraisal; and*
- g) Any development proposals should seek to provide an appropriate range of mix of dwellings in accordance with the latest Strategic Housing Market Assessment.*

## **6. CONCLUSION**

- 6.1 To conclude, Pegasus consider that policies SP16, SP20 and SP23 are unsound as currently drafted and in several instances do not reflect current Government guidance.
- 6.2 The Policies are inflexible and take no account of the housing context which is well evidenced within the NFNPA. The approach is one in which the NFNPA cannot by its own admission identify sufficient sites to meet their own housing requirement.
- 6.3 It is essential therefore that these are amended in line with our suggestions as set out above.
- 6.4 Of greatest concern is the detailed wording of Policy SP23 which seeks to allocate the site. Whilst supportive of the sites allocation the detailed wording suggested by the NFNPA runs contrary to significant evidence prepared by PegasusLife, the sites owner.
- 6.5 We consider the current wording to be overly restrictive.

## **APPENDIX 1**

### **FEBRUARY 2018 REPRESENTATIONS**



**Consultation on the New Forest National Park  
Submission draft Local Plan 2016 - 2036  
January 2018  
Representation Form**

This response form relates to the New Forest National Park Submission draft Local Plan 2016 – 2036. The consultation runs from 17 January – 28 February 2018.

Please take the opportunity to read the Submission draft Local Plan **and accompanying notes to this representation form** before filling in this form and returning it to the Policy Team:

- By email to [policy@newforestnpa.gov.uk](mailto:policy@newforestnpa.gov.uk)
- Or by post to Policy Team at Lymington Town Hall, Avenue Road, Lymington, SO41 9ZG

You can download this form from our website at: [www.newforestnpa.gov.uk/localplan](http://www.newforestnpa.gov.uk/localplan)

**Comments need to be received by 5pm on 28 February 2018 at the latest**

**Your Details**

Title: ...Mr.....

Name: ...Colin Virtue.....

Your client if you are an agent: ...PegasusLife.....

Organisation: ...Pegasus Group.....  
(where relevant)

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Please note any comments made will be made available for public viewing at the Town Hall, Lymington. The Authority processes personal data in accordance with the Data Protection Act 1998. The purposes for collecting this data are to contact you to; acknowledge receipt of this form and seek further information regarding the information provided in this form (where necessary). We will hold your personal data securely. It will not be used for any purposes other than set out above, nor will it be supplied to anyone outside the Authority without first obtaining your consent (unless we are obliged by law to disclose it). More information on how we hold personal information can be found at: [www.newforestnpa.gov.uk/privacyandcookies](http://www.newforestnpa.gov.uk/privacyandcookies)

Please complete a separate form for each representation

**1. To which part of the Local Plan does this representation relate?**

Paragraph(s) (enter number)	
Policy (enter number)	DP2- General Development Principles
Policies Map	

**2. Do you consider the Local Plan is:**

	Yes	No
Legally compliant		<b>x</b>
Sound		<b>x</b>
Complies with the Duty to co-operate		

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

We support the overall emphasis of policy DP2. However, it should be recognised that it may not always be possible for all developments to meet and fulfil all the criteria set out in the policy. The wording of the policy should reflect this and be flexible enough to support development that is in general accordance with the Development Plan.

“Should” is a suitable word to include in policy because it encourages good development management which comprises a balancing of considerations within the overall commitment to sustainable development. This understanding is derived from section 70 of the Act (1990) and s.38(6) of the Act (2004), both of which refer to the balancing of all material considerations. This approach is reflected in the Framework’s commitment to sustainable development and should feed through into the wording of development plan policy, in accordance with the statutory requirement in s.39 of the Act (2004) for plans to be prepared in furtherance of the objective of achieving sustainable development.

It is inherent that not all developments will perform equally against all 3 strands of sustainable development in the Framework, but local policy should be flexible enough to leave the decision maker free to balance considerations on an application-specific basis.



Therefore, we suggest that the first paragraph should read:

*“All new development and uses of land within the New Forest National should uphold and promote the principles of sustainable development. New development proposals should demonstrate high quality design and construction which enhances local character and distinctiveness. Wherever possible, this includes ensuring, ...”*

With regard to both criteria e) and f), we consider that the word “significantly” should be inserted before the word “adverse”. This change is suggested in the recognition that worthy and sustainable proposals will have some adverse impact, even if the scale of impact is minute, and/or a perceived rather than actual harm.

(continue on a separate sheet/expand box if necessary)

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<b>No</b> , I do not wish to participate at the oral examination	
<b>Yes</b> , I wish to participate at the oral examination	✓

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<p>To discuss matters relating to housing for older people and in relation to the proposed allocation of the former Lyndhurst Park Hotel owned by PegasusLife.</p> <p>(continue on a separate sheet/expand box if necessary)</p>
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**Comments need to be received by 5pm on 28 February 2018 at the latest**

**Your Details**

Title: ...Mr.....

Name: ...Colin Virtue.....

Your client if you are an agent: ...PegasusLife.....

Organisation: ...Pegasus Group.....  
(where relevant)

Tel No: ..01454 625945.....

Address: ..Equinox North, Great Park Road,  
Almondsbury, Bristol .....

E-mail:  
colin.virtue@pegasusgroup.co.  
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Please complete a separate form for each representation

**1. To which part of the Local Plan does this representation relate?**

Paragraph(s) (enter number)	
Policy (enter number)	DP34- Residential Character of the Defined Villages
Policies Map	

**2. Do you consider the Local Plan is:**

	Yes	No
Legally compliant	<b>x</b>	
Sound		<b>x</b>
Complies with the Duty to co-operate		

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

We support the intention that proposals must be informed by the consideration of local character.

However, we consider that the second sentence of the policy is not necessary and is too vague and should be deleted. It states that “the four Defined Villages are rural areas often characterised by spacious residential plots set within mature landscapes...”.

However, the explanatory text at paragraph 7.72 points to the fact that the built character of the villages is “varied” and refers to both close-knit development and more spacious areas.

(continue on a separate sheet/expand box if necessary)

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**1. To which part of the Local Plan does this representation relate?**

Paragraph(s) (enter number)	SP16- The Historic and Built Environment
Policy (enter number)	
Policies Map	

**2. Do you consider the Local Plan is:**

	Yes	No
Legally compliant		<b>x</b>
Sound		<b>x</b>
Complies with the Duty to co-operate		

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We object to the wording of the draft policy. The structure of part a) of the policy misinterprets the NPPF's approach toward assessing significance and balancing benefits against any negative impact on designated and non-designated heritage assets.

The existing Core Strategy policy C7 is flawed in a similar fashion. At paragraph 13 of the Watersplash appeal decision (ref 3162888) the Inspector stated:

*"CS Policy CP7 requires development to protect, maintain and enhance locally important features of the built environment. This policy pre-dates the National Planning Policy Framework (the Framework) and does not reflect the approach of weighing any harm to a designated heritage asset against the public benefits of the proposed development, set out at paragraph 134. Therefore, I shall afford more weight to the Framework..."*

Therefore, it is clear that policy SP16 should reflect the NPPF, including paragraph 134. It is suggested that criterion (iv) of part a) of the policy should be set out separately to reflect the correct policy mechanism and interpretation of paragraph 134 and s.39 of the Act (2004).



Part b) of the policy requires that all development proposals that affect a heritage asset are accompanied by an evidenced justification and a suggested mitigation.

The NPPF (e.g. paragraphs 132 to 135) requires a proportionate approach to heritage statements in support of applications. There is no requirement for “evidenced justification” and “mitigation” in respect of every single heritage asset.

Instead, the Framework sets out a nuanced and hierarchical approach to the assessment of heritage effects within the overall planning balance. Designated heritage assets are afforded a greater measure of protection than undesignated heritage assets. To insist upon a blanket approach to all heritage assets, irrespective of their status, both in terms of application materials and mitigation proposals is inconsistent with this nuanced approach of national policy.

By way of specific example, national policy is clear about the expectations in terms of the analysis and evidence required to justify demolition of a listed building or a change away from its historic, designed use. There is no such requirement in the case of an unlisted building, which might, nevertheless, constitute a non designated heritage asset. To insist, via local policy, on equal treatment is contrary to national policy and therefore unsound.

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The policy should be re-worded to reflect the above. Alternatively, we question whether there is, in fact, any need to include a separate heritage development management policy at all given the statutory duties and the clear policy in the NPPF.

(continue on a separate sheet/expand box if necessary)

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Please complete a separate form for each representation

**1. To which part of the Local Plan does this representation relate?**

Paragraph(s) (enter number)	
Policy (enter number)	SP20- Specialist Housing for Older People
Policies Map	

**2. Do you consider the Local Plan is:**

	Yes	No
Legally compliant		x
Sound		x
Complies with the Duty to co-operate		

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

We support the inclusion within this version of the Plan of a policy that seeks to address the need for housing for older people. This reflects paragraph 50 of the NPPF, which confirms that local authorities must plan for the housing needs of groups including older people, and the evidence base that supports the Submission Plan which confirms the growing population of older people.

We support the Plan's recognition at paragraphs 7.10 and 7.11 of the ageing population within the National Park and the importance of taking opportunities to address the need for specialist housing for older people.

However, we object to the precise wording of Policy SP20 for the following reasons:

- The wording of the policy should make it clear that housing for older people is supported at the housing allocations;
- The policy should be more flexible in allowing housing for older people outside of the Defined Villages, and;

- The intention to restrict occupation to existing residents only should be deleted.

We explain the detailed reasons for these objections below.

### Retirement Housing at the Allocations

Paragraph 7.10 (informed by the Council's 2014 SHMA) confirms that the population of those aged 60 and over has increased by 24% (2,560 persons) between 2002 and 2012, whilst the population of younger age groups has decreased, and this trend is predicted to increase over the plan period. In the context of the total population of 35,000 residents in the Park, this population growth is very significant. Balanced against this population growth, paragraph 7.12 confirms that there is a 'limited availability of sites'.

No specific sites for retirement housing are proposed to be allocated in the Plan and we therefore consider that it will be important that the residential allocations are flexible enough to be able to deliver housing that meets the needs of the Park's ageing population. The evidence of the ageing population in the Park serves to indicate why this is critical.

The 'Defined Village' boundaries at Lyndhurst, Sway and Ashurst are not proposed to be altered to incorporate the proposed housing allocations at these settlements. The village boundaries should be redrawn to include these sites, or, the wording of Policy SP 20 should be amended to make clear that housing for older people will be permitted within the Defined Villages and at allocated housing sites.

### Meeting The Housing Needs of Older People

Whilst we fully appreciate the planning constraints that are applicable in much of the National Park, and indeed its statutory purpose, we consider that the proposed approach of draft policy SP20 to prevent any development of housing for older people outside the Defined Villages is too restrictive.

The Authority acknowledges the rapidly ageing population of the National Park. Page 10 of the Authority's Housing Topic Paper (January 2018) also identifies high levels of under occupation of homes and suggests that policies could help to ensure that there is appropriate housing available for households. Linked to this under occupation, it also points to a housing stock that is skewed toward larger detached properties.

The appended report prepared by Contact Consulting was first submitted in support of the recently refused planning application (ref 17/00732) at Lyndhurst Park Hotel. Paragraph 5.6 of that report states:

*"In 2016 those sixty-five years or over already made up 29.92% of the total population of Lyndhurst, compared with 27.62% for the whole of the New Forest District Council area in 2015. The disparity is maintained in the 2031 figure for Lyndhurst when those sixty-five years of age and over will make up 38.32% of the total population, compared with the 2030 figure for the New Forest District Council area of 33.86%".*

The report also points to significant numbers of old people in Lyndhurst and the wider National Park who struggle to carry out every-day tasks that most people take for granted.

In respect to an appeal decision for older persons housing at the Watersplash site in Brockenhurst (appeal ref 3162888, April 2017) the Inspector, at paragraph 18 of his decision, said:

*"It was common ground that in the area administered by the New Forest District Council, older people formed a much higher percentage of the population than the national average. In Brockenhurst, I am given to understand that the percentage of resident older people is even higher and is forecast to increase significantly over the next twenty years. The number of older people having difficulty with domestic tasks or personal care was also predicted to rise. Detailed evidence submitted on behalf of the appellant suggested that the proposed development would meet the current*

*and future needs of an increasing number of older people who live in the village and wish to continue to live in their own home as part of the community, as opposed to having to move away to find specialist accommodation. At the hearing it was said on behalf of the appellant that without such accommodation, the end result could be older people in the village being 'trapped' in their homes or moving away, both resulting in social disadvantage. It was also pointed out on behalf of the appellant that the majority of older people in the New Forest District area owned their own home and the provision of specialist accommodation for older people had largely not been directed at owner-occupiers, leading to a supply deficit in respect of accommodation for that form of tenure. Much of this evidence was based on a sound analysis of public statistical data and I found the conclusions to be robust and credible". (our emphasis added)*

Paragraph 19 of the decision goes on to say, in part:

*"I also accept that the number of specialist housing units for older people identified in the Strategic Housing Market Assessment (SHMA) dating from 2014 cannot be relied upon as the final requirement in the forthcoming replacement Local Plan as it does not take account of other constraints. The majority of that requirement is therefore likely to be met outside of the NPA area. Even so, given the significant number of units identified in the SHMA, it is still likely to leave a substantial residual requirement for this form of accommodation in the NPA area, which the proposed development would help to address". (our emphasis added)*

The needs based evidence that supported the Watersplash appeal was carried out by the same consultant who has undertaken the attached needs based evidence supporting the refused planning application at Lyndhurst Park Hotel.

In summary, there is clear proven evidence that the population of older people, and in particular, the population of older people who have difficulty with one or more tasks essential to daily living, is growing very substantially and that there is a very significant unmet need for specialist housing for older people, both in Lyndhurst and the wider National Park. Moreover, this unequal growth in relation to the population as a whole is predicted to continue and speed up over the plan period.

The draft Local Plan does not propose to make specific allocations for sites for housing for older people, but paragraph 37 of the Planning Practice Guidance states:

*"Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement".*

We fully appreciate that, given the planning policy context of the National Park, the opportunities to find suitable sites outside the Defined Villages will be very limited but some flexibility should be maintained, in case an appropriate site should come forward. This also emphasises why the Plan should support housing for older people on the allocated sites.

#### Restricting Occupation to Existing Local Residents

We object strongly to the policy seeking to restrict specialist housing for older people to residents who have lived in the Park for a minimum of 5 years on the basis that there is no justification for this restriction.

Whilst we understand the Authority's desire that the local community benefit from specialist housing developments, we are very concerned that the wording of the policy inadvertently discriminates against and excludes older people who wish to live in the National Park, perhaps in order to be close to family, or just through personal choice, by removing their opportunity to live in specialist housing.

As referred to above, there is clear evidence of a high need for older persons housing in Lyndhurst and the National Park. It is also logical to suggest that much of the rise in the population of older people is as a result of existing residents enjoying longer lives, rather than an influx of older people in-migrating.

Indeed, paragraph 8.10 of the New Forest Strategic Housing Market Assessment (September 2014) states, in part that:

*“The difference between New Forest and the region is mainly due to the very high proportion of older people currently in the population (which makes higher proportionate increase difficult). In terms of actual numbers of people, the older person population of New Forest is expected to increase significantly moving forward”.*

With regard to the question of affordability, paragraph 1.6 of the Housing Topic paper (January 2018) confirms that the average house price in the New Forest was £560,000. Given that older people generally own their homes, it is reasonable to conclude there will be a pool of people in the Park who could move to specialist older persons housing schemes.

In summary, the evidence shows that:

- There is already a much higher elderly population in the National Park compared to the UK average, and the number of older people is predicted to continue to grow;
- There is a high number of people in Lyndhurst and the National Park aged 65 and over; unable to manage at least one activity on their own;
- There is a high under-occupation of homes rate in the National Park;
- There is a shortage of smaller homes in the National Park; and
- Older people are much more likely to own their home outright and the average house price in the New Forest is comparatively high.

Taking all the above into consideration, we consider it very likely that existing older residents of the National Park residents will wish to ‘right-size’ from large detached homes to specialist housing for older people. Schemes of specialist housing for older people will therefore meet the needs of the existing population which is ageing and increasing unable to perform ‘day-to-day’ tasks.

At paragraph 21 of the Watersplash appeal decision the Inspector stated:

*“Overall, whilst there is a risk that some of the future occupiers of the proposed development would not be drawn from the village or its surroundings, it is also likely that a considerable number of existing village residents would be attracted. Consequently, in my view the proposed development would fulfil a local need which would otherwise be unmet”.*

We therefore consider the Authority’s concern about in-migration of older people into the National Park to be misplaced. Existing residents are in need of specialist housing and are likely to move to any such new developments. Providing specialist housing will therefore assist the Park in its statutory role to further the wellbeing of residents.

Notwithstanding, it is simply not appropriate for planning policy to prevent in-migration of older people. This is a very narrow view of social policy that limits the rights of a certain group of people (i.e. older people) to choose where they can live. It also ignores the often sensitive and very personal reasons why older people may wish to relocate in the first place; for example, to be close to family members. The Campaign to End Loneliness report that over half of all people aged 75 and over live alone and loneliness increases the likelihood of mortality by 26%.

There is also no sound or robust planning policy basis to prevent in-migration of older people. Paragraph 50 of the NPPF requires local planning authorities to plan for future demographic

trends, and to meet the full Objectively Assessed Needs of groups including older people. The NPPF makes clear (paragraph 47, bullet 2) that this is the starting point of housing policy formation.

We are not aware that any specific research or evidence informs the proposed restriction of housing for older people as would be required to justify such a policy. By way of an example, the well-known St Ives second homes Neighbourhood Plan policy restriction that received significant coverage in the UK media was evidence based and tested in terms of the resulting impacts. It is worth noting that even this policy, considered by some to be quite radical, does not prevent people moving to live in the town.

We are aware that due to environmental constraints, the National Park is not seeking to meet the full Objectively Assessed Need of 1,260 dwellings in the period 2016 to 2036. The Authority wrote to the Partnership for Urban South Hampshire (PUSH) under the Duty To Co-operate, asking neighbouring authorities to accommodate a shortfall of around 460 dwellings (of the 1,260) in November 2017. However, there is no indication that the Authority is asking other local planning authorities to absorb specialist housing for older people specifically.

We also note that the proposed housing allocations in the Plan (rightly) do not seek to restrict those future homes to existing residents only. There is no reason why any distinction should be made between specialist housing for older people and general needs housing on the basis of whether or not they are occupied by an existing resident of the National Park or not.

The second paragraph of policy SP20 should therefore be deleted.

(continue on a separate sheet/expand box if necessary)

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Postcode: .....BS32 4QL.....

Please note any comments made will be made available for public viewing at the Town Hall, Lymington. The Authority processes personal data in accordance with the Data Protection Act 1998. The purposes for collecting this data are to contact you to; acknowledge receipt of this form and seek further information regarding the information provided in this form (where necessary). We will hold your personal data securely. It will not be used for any purposes other than set out above, nor will it be supplied to anyone outside the Authority without first obtaining your consent (unless we are obliged by law to disclose it). More information on how we hold personal information can be found at: [www.newforestnpa.gov.uk/privacyandcookies](http://www.newforestnpa.gov.uk/privacyandcookies)

Please complete a separate form for each representation

**1. To which part of the Local Plan does this representation relate?**

Paragraph(s) (enter number)	
Policy (enter number)	SP21- The Size of New Dwellings
Policies Map	

**2. Do you consider the Local Plan is:**

	Yes	No
Legally compliant		<b>x</b>
Sound		<b>x</b>
Complies with the Duty to co-operate		

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

We object to Policy SP21 seeking to limit the size of new dwellings to a maximum of 100 square metres on the basis that this limit is too inflexible.

We acknowledge that there is currently a high proportion of larger detached houses in the National Park but consider that the draft policy should take a more positive approach toward creating a more varied mix of dwellings.

Simply limiting new dwellings to a maximum of 100 sqm/3 bedrooms could result in unexpected consequences, for example:

- Planning applications could come forward that propose only the maximum 100sq m 3 bedroom dwellings and no smaller 1 and 2 bed dwellings;
- Site specific conditions suggest that a different mix of dwellings would be preferable. For example, where brownfield land cannot be maximised, or where infill plots amongst larger scale properties cannot be delivered because a smaller 100 sqm dwelling would be out of character with the existing character; and

- An opportunity is missed to provide, for example, a 4 bedroom affordable house that a family could otherwise have occupied.

Using Local Plans to signal for the market what is required across housing tenures and proactively engaging with developers supports the delivery of well targeted and considered housing proposals.

We therefore suggest that the policy be re-drafted so as to encourage a suitable mix of properties that addresses the shortage of 1 to 3 bedroom dwellings, whilst not preventing entirely the development of larger family homes.

(continue on a separate sheet/expand box if necessary)

- 4. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please refer to the above text.

(continue on a separate sheet/expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

- 5. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the examination?**

<b>No</b> , I do not wish to participate at the oral examination	
<b>Yes</b> , I wish to participate at the oral examination	✓

- 6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

<p>To discuss matters relating to housing for older people and in relation to the proposed allocation of the former Lyndhurst Park Hotel owned by PegasusLife.</p> <p>(continue on a separate sheet/expand box if necessary)</p>
--

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.**

Signature: 	Date: 27/02/2018
--	------------------



**Consultation on the New Forest National Park  
Submission draft Local Plan 2016 - 2036  
January 2018  
Representation Form**

This response form relates to the New Forest National Park Submission draft Local Plan 2016 – 2036. The consultation runs from 17 January – 28 February 2018.

Please take the opportunity to read the Submission draft Local Plan **and accompanying notes to this representation form** before filling in this form and returning it to the Policy Team:

- By email to [policy@newforestnpa.gov.uk](mailto:policy@newforestnpa.gov.uk)
- Or by post to Policy Team at Lymington Town Hall, Avenue Road, Lymington, SO41 9ZG

You can download this form from our website at: [www.newforestnpa.gov.uk/localplan](http://www.newforestnpa.gov.uk/localplan)

**Comments need to be received by 5pm on 28 February 2018 at the latest**

**Your Details**

Title: ...Mr.....

Name: ...Colin Virtue.....

Your client if you are an agent: ...PegasusLife.....

Organisation: ...Pegasus Group.....  
(where relevant)

Tel No: ..01454 625945.....

Address: ..Equinox North, Great Park Road,  
Almondsbury, Bristol .....

E-mail:  
colin.virtue@pegasusgroup.co.  
uk.....

Postcode: .....BS32 4QL.....

Please note any comments made will be made available for public viewing at the Town Hall, Lymington. The Authority processes personal data in accordance with the Data Protection Act 1998. The purposes for collecting this data are to contact you to; acknowledge receipt of this form and seek further information regarding the information provided in this form (where necessary). We will hold your personal data securely. It will not be used for any purposes other than set out above, nor will it be supplied to anyone outside the Authority without first obtaining your consent (unless we are obliged by law to disclose it). More information on how we hold personal information can be found at: [www.newforestnpa.gov.uk/privacyandcookies](http://www.newforestnpa.gov.uk/privacyandcookies)

Please complete a separate form for each representation

**1. To which part of the Local Plan does this representation relate?**

Paragraph(s) (enter number)	
Policy (enter number)	Policy SP23- Land at the former Lyndhurst Park Hotel
Policies Map	

**2. Do you consider the Local Plan is:**

	Yes	No
Legally compliant		<b>x</b>
Sound		<b>x</b>
Complies with the Duty to co-operate		

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

We broadly support the allocation of the former hotel site for redevelopment, but object to certain aspects of the policy.

The policy seeks to allocate the site for mixed-use, including tourism and residential. We consider that it should be made clear that the comprehensive development of the site should be residential led and should deliver a minimum of 50 houses.

We make this suggestion on the basis that:

- The site is being allocated as one of the Plan's 'housing site allocations';
- The site provides a very significant brownfield site resource that, taking other considerations such as the limited availability of sites into account, should be maximised, especially because the Authority is requesting that other adjoining authorities meet the shortfall of housing from the National park;
- There is no strong evidence of a need for tourism uses and the Local Plan (through policy SP46) is only seeking to support "small scale" tourism development. In

comparison, a very high need for residential development to serve the needs of the Park's population has been identified, as described above.

The policy does not specify exactly where/how tourism uses can be accommodated on the site but appears to suggest that the historic elements of the former hotel building could be suitable for tourism use.

The District Valuer (confidentially) provided advice to the Authority with regard to the recently refused planning application at the former Lyndhurst Park Hotel and specifically the financial viability of the refused scheme. Page 8 of the advice to the Council stated:

*"The hotel has been left to fall into disrepair and it is not unreasonable to conclude that the resurrection of a hotel use is unlikely, with costs required to do so expected to be very high".*

In addition, a report by Chris Morton Associates (appendix to these representations) was submitted in support of the refused planning application. This report concludes that the former hotel represented an ageing tourism accommodation product and that refurbishing the hotel was unlikely to be viable, especially as demand appeared to be too low.

In summary, there is no available evidence that suggests a suitable and sustainable tourism use exists that would retain the hotel building.

Turning to the specific criteria including within the policy, we support the comprehensive development of the site (criterion (a)). As owners of the site, PegasusLife intends to retain the site in a single freehold ownership and develop the site for extra care housing that will be operated and managed as a single entity. This will create benefits in terms of ensuring comprehensive development at the site and retaining features such as trees and boundary planting.

The plans submitted alongside these representations illustrate how the site can be developed in a comprehensive manor to maximise the benefit to the Parks residents whilst also retaining key tree and boundary planting.

We object to criterion (b), which states that the 'historic elements of the existing hotel must be retained' on the basis that the policy is not precise, is not justified and is contrary to national planning guidance, as explained by our comments regarding the generic draft policy concerning heritage assets.

The images below are lifted from the Heritage Assessment that accompanied the recently refused planning application at the site. The different colours indicate the different areas of the building constructed at different times in its history, from the late 1800's through to the 1970's. It is not clear which parts of the building the policy is referring to as the 'historic elements'.







Moreover, the requirement that development proposals 'must' retain elements of the building is contrary to national planning guidance. The former hotel is not Listed and is not a 'designated heritage asset'. Neither the NPPF or legislation concerning heritage assets sets out such protection for a non-designated heritage asset.

Paragraph 135 of the NPPF states:

*"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset".*

Therefore, the correct process is to assess the significance of an asset as part of any planning application that proposes its demolition. No evidence or assessment has been provided by the Authority which considers the significance of the hotel, and for this reason also, the policy is unjustified. Criterion (b) should be deleted.

We object to criterion (c) for similar reasons to criterion (b). The wording of the policy presently requires that any development must conserve and enhance the Conservation Area and in doing so, would be directing a decision maker to refuse a planning application if any harm resulted to a Conservation Area. However, paragraphs 133 and 134 of the NPPF require a decision maker to balance public benefits against any resulting harm to a designated heritage asset (e.g Conservation Area). Unsurprisingly, national policy reflects the legal test under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which applies a weighting in the consideration of any planning application within a conservation area to the preservation or enhancement of the character or appearance of the conservation area, rather than applying a blanket prohibition to any form of harm.

Therefore, the wording of criterion (c) should be re-drafted to accord with national planning guidance.

With regard to criterion (d), we suggest that the word 'must', be changed to 'should'. It is not clear which trees the policy considers to be "important" and some flexibility should be retained because a comprehensive development involving approximately 50 dwellings is likely to result in the loss of at least 1 or more trees on the site.

Having regard to our comments in relation to policy SP 21, criterion (g) should be deleted. It also repeats policy SP 21, and so is unnecessary.

Criterion (h) should also be deleted because it is not justified (see response to Policy SP20) and because it repeats policy SP 20.

We question the basis for the need to include criterion (i).

(continue on a separate sheet/expand box if necessary)

4. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to the above text.

(continue on a separate sheet/expand box if necessary)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

5. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	✓

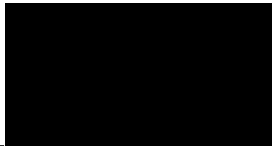
6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To discuss matters relating to housing for older people and in relation to the proposed allocation of the former Lyndhurst Park Hotel owned by PegasusLife.

(continue on a separate sheet/expand box if necessary)

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.**

Signature:

A black rectangular box redacting the signature.

Date: 27/02/2018



**Consultation on the New Forest National Park  
Submission draft Local Plan 2016 - 2036  
January 2018  
Representation Form**

This response form relates to the New Forest National Park Submission draft Local Plan 2016 – 2036. The consultation runs from 17 January – 28 February 2018.

Please take the opportunity to read the Submission draft Local Plan **and accompanying notes to this representation form** before filling in this form and returning it to the Policy Team:

- By email to [policy@newforestnpa.gov.uk](mailto:policy@newforestnpa.gov.uk)
- Or by post to Policy Team at Lymington Town Hall, Avenue Road, Lymington, SO41 9ZG

You can download this form from our website at: [www.newforestnpa.gov.uk/localplan](http://www.newforestnpa.gov.uk/localplan)

**Comments need to be received by 5pm on 28 February 2018 at the latest**

**Your Details**

Title: ...Mr.....

Name: ...Colin Virtue.....

Your client if you are an agent: ...PegasusLife.....

Organisation: ...Pegasus Group.....  
(where relevant)

Tel No: ..01454 625945.....

Address: ..Equinox North, Great Park Road,  
Almondsbury, Bristol .....

E-mail:  
colin.virtue@pegasusgroup.co.  
uk.....

Postcode: .....BS32 4QL.....

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Please complete a separate form for each representation

**1. To which part of the Local Plan does this representation relate?**

Paragraph(s) (enter number)	
Policy (enter number)	SP27- Affordable Housing Provision within the Defined Villages and on Allocated Sites
Policies Map	

**2. Do you consider the Local Plan is:**

	Yes	No
Legally compliant	x	
Sound		x
Complies with the Duty to co-operate		

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Paragraph 7.45 confirms that affordable housing will be sought on all developments falling into Use Class C3. We suggest that reference is made to this within the policy wording itself for sake of clarity.

(continue on a separate sheet/expand box if necessary)

4. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Paragraph 7.45 confirms that affordable housing will be sought on all developments falling into Use Class C3. We suggest that reference is made to this within the policy wording itself for sake of clarity.

(continue on a separate sheet/expand box if necessary)

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5. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	
--	--

Yes, I wish to participate at the oral examination	✓
--	---

**6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

<p>To discuss matters relating to housing for older people and in relation to the proposed allocation of the former Lyndhurst Park Hotel owned by PegasusLife.</p> <p>(continue on a separate sheet/expand box if necessary)</p>
--

**Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.**

<p>Signatur </p>	<p>Date: 27/02/2018</p>
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## **APPENDIX 2**

### **2016 DECISION NOTICE (16/01000)**





Mr C Cox  
Pegasus Planning Group Ltd  
First Floor, South Wing  
South Wing  
Equinox North  
Great Park Road, Almondsbury, Bristol  
BS32 4QL

Application Number: **16/01000**

15 February 2017

### **TOWN AND COUNTRY PLANNING ACT 1990**

Applicant: PegasusLife Ltd

Date of Application: 30 November 2016

**THE NEW FOREST NATIONAL PARK AUTHORITY** as the Local Planning Authority  
**REFUSES TO GRANT PLANNING PERMISSION** for the following development:

**Development**      **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**

**Site**                      **Lyndhurst Park Hotel, 78 High Street, Lyndhurst, SO43 7NL**

This decision has been taken in respect of the following plans:

Drwgs: 1615-P001 Rev 01, 1615-P100 Rev 01, 1615-P101 Rev 01, 1615-P200 Rev 01, 1615-P201 Rev 01, 1615-P202 Rev 01, 1615-P203 Rev 01, 1615-P300 Rev 01, 1615-P301 Rev 01, 1615-P302 Rev 01, 1615-P303 Rev 01, 1615-P304 Rev 01, 1615-P305 Rev 01, 1615-P306 Rev 02, 1615-P010 Rev 01, LL516-050-0001, LL516-050-0006, LL516-050-0011, LL516-050-0012, LL516-050-0013, LL516-050-0041, LL516-050-0101, LL516-050-0102, LL516-050-0103.

### **Reason(s) for refusal:**

1. The application site lies outside the boundary of the defined village of Lyndhurst where new development is restricted. The New Forest National Park Core Strategy and Development Management Policies DPD (December 2010) seeks to retain existing hotel and employment uses. New residential

**New Forest National Park Authority**  
LYMINGTON TOWN HALL, AVENUE ROAD, LYMINGTON SO41 9ZG  
**Telephone** 01590 646600 **Fax** 01590 646666

**www.newforestnpa.gov.uk**  
**CHAIRMAN** OLIVER CROTHWAITE-EYRE **CHIEF EXECUTIVE** ALISON BARNES

development is restricted to extensions, replacement dwellings or affordable housing, and the development of 74 self-contained apartments and 12 self-catering apartments with no provision at all for affordable housing, and which would also result in the loss of the existing hotel would be contrary to policies CP9, CP11 and CP12 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010).

2. The existing building lies within the Lyndhurst Conservation Area. The submitted Heritage Assessment has not demonstrated to the satisfaction of the National Park Authority the historic significance of the existing building and its contribution to the Lyndhurst Conservation Area through careful analysis. In addition, no justification has been submitted to support its demolition through either detailed structural analysis, or consideration of alternative uses. Whilst its loss would result in less than substantial harm to the setting of adjoining listed buildings and the character and appearance of the conservation area, there would still be unacceptable harm of significance. The proposal would therefore be contrary to policies CP7, CP8 and DP6 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010) and also Section 12 (paragraph 128) of the NPPF.
3. The proposed development, by virtue of its excessive scale, massing, layout, height and cumulative impact, would fail to respond to the context of the site, the character and appearance of the conservation area, and the wider landscape setting of the village and adjoining open forest. The density of development, lack of open space, loss of significant boundary screening and increased light pollution would significantly and adversely alter the existing character of the site and create a dominant form of development and overly urban environment which would be entirely at odds with the sensitive edge of the village site so close to the open forest and iconic Bolton's Bench. For these reasons it would be contrary to policies CP7, CP8, CP9, DP1 and DP6 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010).
4. The application site lies in close proximity to internationally and nationally designated sites (SSSI, SPA, SAC, Ramsar) and it has not been demonstrated to the satisfaction of the National Park Authority, through adequate mitigation measures, that there would not be significant in-combination impacts on the ecological sensitivities of these areas. The proposal would therefore be contrary to policies CP1 and CP2 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010) and Section 11 of the NPPF.
5. The proposed development, by virtue of its excessive scale, layout and lack of useable open space, would result in foreseeable undue pressure to fell or reduce protected trees of high public amenity value which would significantly

**New Forest National Park Authority**

LYMINGTON TOWN HALL, AVENUE ROAD, LYMINGTON SO41 9ZG

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**CHAIRMAN** OLIVER CROTHWAITE-EYRE **CHIEF EXECUTIVE** ALISON BARNES

harm the overall existing verdant character of the site. The proposal would therefore be contrary to policies CP2 and DP1 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010).

6. The proposal does not incorporate sufficient car parking provision within the site clear of the highway with the result that it would be likely to encourage the parking of vehicles on the public highway which would interrupt the free flow of traffic to the detriment of highway safety. From the information submitted, it cannot therefore be shown that the development can be accommodated in a manner that would not cause increased danger and inconvenience to highway users. For these reasons the application would be contrary to policy CP19 of the New Forest National Park Core Strategy and Development Management Strategy DPD (December 2010).

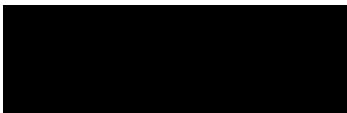
**Notes to applicant:**

1. Important notes, including the rights of appeal, are set out on a sheet attached to this notice and you are advised to read these carefully.

**Informative(s):**

1. The Authority has considered the application in relation to its adopted Core Strategy, the National Planning Policy Framework and any other relevant material planning consideration and has concluded that the application proposes such an inappropriate form of development that no amendments could be recommended to enable planning permission to be granted.

Date: 15 February 2017



Steve Avery  
Executive Director (Strategy & Planning)

## NOTES TO APPLICANTS / AGENTS

### Fees for discharge of planning conditions

- The fee chargeable in relation to submissions for any consent, agreement or approval required by a planning condition is £97 per request or £28 where the related permission was for extending or altering a dwelling house or other development in the curtilage of a dwelling house. **The fee is payable for each submission made regardless of the number of conditions you are seeking approval for.**
- A fee is payable for conditions related to planning permissions and reserved matter applications only. A fee is not required for conditions attached to listed building consents and conservation area consents.
- You may wish to use the standard form to accompany your submission or set out your requests in writing clearly identifying the relevant planning application and condition(s) which you seek approval for.

### Non Material Amendments

- Central Government has introduced a new application form for the submission of Non Material Amendments to approved plans. From 1 October 2009 all submissions must be on the correct application form. (Forms & guidance notes are available on the Authority's website [www.newforestnpa.gov.uk](http://www.newforestnpa.gov.uk)).
- The fee chargeable is £195 per request or £28 where the related permission was for extending or altering a dwelling house or other development in the curtilage of a dwelling house.

**New Forest National Park Authority**

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**CHAIRMAN** OLIVER CROTHWAITE-EYRE **CHIEF EXECUTIVE** ALISON BARNES

## Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal against your local planning authority's decision then you must do so:

within **12 weeks** of the date of this notice for minor commercial applications  
(typically only apply to an application to alter the shopfront of an A1, A2, A3, A4, or A5 property) **otherwise;**  
within **6 months** of the date of this notice for all other types of application.

If the application relates to a matter that is the subject of an enforcement investigation the Authority's Enforcement team will contact you again as different timescales are likely to be appropriate.

- Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0303 444 5000) or online at <https://acp.planninginspectorate.gov.uk>.
- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.
- If an enforcement notice has been served in the previous 2 years you will have only 28 days in which to lodge the appeal following the refusal. Equally, if an enforcement notice is served after the refusal it will truncate the period for lodging the appeal against the refusal of planning permission to 28 days after the enforcement notice has been served.

## Purchase Notices

- If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

### New Forest National Park Authority

LYMINGTON TOWN HALL, AVENUE ROAD, LYMINGTON SO41 9ZG

Telephone 01590 646600 Fax 01590 646666

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CHAIRMAN OLIVER CROTHWAITE-EYRE CHIEF EXECUTIVE ALISON BARNES

## **APPENDIX 3**

### **2017 DECISION NOTICE (17/00732)**



Mr C Cox  
Pegasus Planning Group Ltd  
First Floor  
South Wing  
Equinox North  
Great Park Road, Almondsbury, Bristol  
BS32 4QL

Application Number: **17/00732**

12 December 2017

### **TOWN AND COUNTRY PLANNING ACT 1990**

Applicant: N/A, PegasusLife Ltd

Date of Application: 29 August 2017

**THE NEW FOREST NATIONAL PARK AUTHORITY** as the Local Planning Authority  
**REFUSES TO GRANT PLANNING PERMISSION** for the following development:

**Development**      **Creation of 75 age restricted residential units integrated with communal, wellness and support facilities; 15 no.affordable dwellings; associated car and cycle parking; landscaping; refuse store; sub station; alteration of existing vehicular and pedestrian access; demolition of existing hotel and buildings**

**Site**                      **Lyndhurst Park Hotel, 78 High Street, Lyndhurst, SO43 7NL**

This decision has been taken in respect of the following plans:

Drawing nos: 1615-P0001 Rev 00, 1615-P0010 Rev 00, 1615-P3000 Rev 00, 1615-P3001 Rev 00, 1615-P2000 Rev 00, 1615-P2001 Rev 00, 1615-P2002 Rev 00, 1615-P2003 Rev 00, 1615-P3002 Rev 00, 1615-P3003 Rev 00, 1615-P3004 Rev 00, 1615-P3005 Rev 00, 1615-P3006 Rev 00, 1615-P1000 Rev 00, 1615-P1001 Rev 00, LL516-100-0001, LL516-100-0011, LL516-100-0041, LL516-100-0141, LL516-100-0012, LL516-100-0013, LL516-100-0101, LL516-100-0102, LL516-100-0103

## **Reason(s) for refusal:**

1. The application site lies outside the boundary of the defined village of Lyndhurst and close to the New Forest Special Protection Area where new development is restricted. The New Forest National Park Core Strategy and Development Management Policies DPD (December 2010) seeks to retain existing hotel and employment uses where these contribute to the sustainability of local communities through policies CP15 and CP16. New residential development is limited to extensions, replacement dwellings and small-scale affordable housing and the development of 90 dwellings in this location would be contrary to policies CP9, CP11 and CP12 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010).
2. The proposed development, by virtue of its excessive scale, massing, layout, height and cumulative impact, would fail to respond to the context of the site, the character and appearance of the Conservation Area, and the wider landscape setting of the village and adjoining open forest. The density of development, lack of open space, loss of significant boundary screening and increased light pollution would significantly and adversely alter the existing character of the site and create a dominant form of development and overly urban environment which would be entirely at odds with the sensitive more spacious edge of the village site so close to the open forest and iconic Bolton's Bench. For these reasons it would be contrary to policies CP7, CP8, CP9, DP1 and DP6 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010).
3. The existing building lies within the Lyndhurst Conservation Area. The submitted Heritage Assessment has not demonstrated to the satisfaction of the National Park Authority the historic significance of the existing building (evidential, historical, aesthetic and communal) and its contribution to the Lyndhurst Conservation Area through careful analysis. In addition, no justification has been submitted to support its complete demolition through either detailed structural analysis, or consideration of alternative uses. Whilst its loss would result in less than substantial harm to the setting of adjoining listed buildings and the character and appearance of the Conservation Area, there would still be unacceptable harm of significance. The proposal would therefore be contrary to policies CP7, CP8 and DP6 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010) and also Section 12 (paragraph 128) of the NPPF.
4. The application site lies in close proximity to internationally and nationally designated sites (SSSI, SPA, SAC, Ramsar) and it has not been demonstrated to the satisfaction of Natural England and the National Park Authority, through adequate mitigation measures, that there would not be significant in-combination impacts on the ecological sensitivities of these areas. The proposal would therefore be contrary to policies CP1 and CP2 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010) and Section 11 of the NPPF.

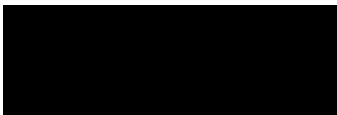


5. The proposed development, by virtue of its excessive scale, layout and lack of useable open space, would result in foreseeable undue pressure to fell or reduce protected trees of high public amenity value which would significantly harm the overall existing verdant character of the site. The proposal would therefore be contrary to policies CP2 and DP1 of the New Forest National Park Core Strategy and Development Management Policies DPD (December 2010).

**Notes to applicant:**

1. Important notes, including the rights of appeal, are set out on a sheet attached to this notice and you are advised to read these carefully.

Date: 12 December 2017



Steve Avery  
Executive Director (Strategy & Planning)

## NOTES TO APPLICANTS / AGENTS

### Fees for discharge of planning conditions

- The fee chargeable in relation to submissions for any consent, agreement or approval required by a planning condition is £97 per request or £28 where the related permission was for extending or altering a dwelling house or other development in the curtilage of a dwelling house. **The fee is payable for each submission made regardless of the number of conditions you are seeking approval for.**
- A fee is payable for conditions related to planning permissions and reserved matter applications only. A fee is not required for conditions attached to listed building consents and conservation area consents.
- You may wish to use the standard form to accompany your submission or set out your requests in writing clearly identifying the relevant planning application and condition(s) which you seek approval for.

### Non Material Amendments

- Central Government has introduced a new application form for the submission of Non Material Amendments to approved plans. From 1 October 2009 all submissions must be on the correct application form. (Forms & guidance notes are available on the Authority's website [www.newforestnpa.gov.uk](http://www.newforestnpa.gov.uk)).
- The fee chargeable is £195 per request or £28 where the related permission was for extending or altering a dwelling house or other development in the curtilage of a dwelling house.

## Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal against your local planning authority's decision then you must do so:

within **12 weeks** of the date of this notice for minor commercial applications (typically only apply to an application to alter the shopfront of an A1, A2, A3, A4, or A5 property) **otherwise**; within **6 months** of the date of this notice for all other types of application.

If the application relates to a matter that is the subject of an enforcement investigation the Authority's Enforcement team will contact you again as different timescales are likely to be appropriate.

- Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0303 444 5000) or online at <https://www.gov.uk/planning-inspectorate>.
- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.
- If an enforcement notice has been served in the previous 2 years you will have only 28 days in which to lodge the appeal following the refusal. Equally, if an enforcement notice is served after the refusal it will truncate the period for lodging the appeal against the refusal of planning permission to 28 days after the enforcement notice has been served.

## Purchase Notices

- If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

## **APPENDIX 4**

### **HOUSING NEEDS REPORT**



**The case for a  
Pegasus Life  
development of  
Retirement Living  
Apartments on the  
site of the former  
Lyndhurst Park  
Hotel, High Street,  
Lyndhurst, in the  
New Forest National  
Park.**

**Nigel Appleton**

**1<sup>st</sup> September 2017**



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# 1 Introduction

1.1 The traditional accommodation and care pathway for those passing through old age took shape in the 1950s as the health and social care reforms of 1940s that shaped health and social care were matched by developments in specialised accommodation for older people. This pathway starts with those living in general housing, moves through sheltered housing and then crosses the -threshold of institutional care provision into residential care and then nursing home care. Beyond this might lie long-term hospital care but this was largely removed from the range of provision with the closure of long-stay geriatric hospital wards in the 1970s.

1.2 Progression through these categories of provision was prompted by assessment of functional deficit or deterioration of health and marked by a regressional trade-off between access to care and quality of living conditions. Thus those who needed care could access it by surrendering the space, privacy and independence of general or sheltered housing for the bed space, locker and shared facilities of residential or nursing care.

1.3 The linkage between accommodation context and a “blanket” pattern of care in the traditional pattern of accommodation and care services is shown in Figure A

**Figure A The traditional configuration of accommodation and care for older people**

Accommodation Context	Characteristics
General Housing	Community personal social care. Community medical, nursing and para-medical services. Meals on wheels. Provision on demand according to need.
Sheltered Housing	As above but with support from a warden, generally resident on site. Provision on demand according to need.
Residential Care	Intensive personal social care. Community medical and para-medical services. All meals provided. “Blanket” provision.
Nursing Homes	Intensive nursing and personal social care. Special arrangements for medical and para-medical services. All meals provided. “Blanket” provision.

1.4 Through the 1970s and 1980s the main focus in making provision for older people was through the development of sheltered housing, originally, and predominantly, for social rent. In the 1980s pioneer private developers began to produce a very similar model of retirement housing for sale by long lease to older home owners.

1.5 From the peak of its popularity in the late 1970s sheltered housing for rent has experienced something of a reversal in fortunes. Some schemes have proved difficult to let and in others existing facilities and patterns of service have been found to have limitations in coping with the needs of an ageing and increasingly frail tenant population.

1.6 Through the 1990s policy and investment decisions at national and local levels began to be influenced by the general perception that in most parts of the country there was a sufficient supply of conventional sheltered housing but that opportunities existed to add to the stock of Very Sheltered, or Extra Care Housing. This was substantiated in McCafferty's 1994 study for the Department of the Environment<sup>1</sup> that concluded that there was "a significant unmet need for very sheltered housing and a potential over-provision of ordinary sheltered housing". Little new sheltered housing for rent has been built in the past twenty years although demand for retirement housing for sale has continued to be strong with that majority of older people who are now home owners.<sup>2</sup>

1.7 Alongside this rise and partial decline in the popularity of sheltered housing, at least in the social rented sector, there has been a similar rise and fall in the fortunes of Residential Care. The roots of residential care in the public sector may be traced beyond the 1948 National Assistance Act<sup>3</sup> to Poor Law provisions stretching back into the nineteenth century. Much of the older provision was replaced in the 1960s and 1970s with subsequent legislation and practice leading to improvements in standards. The introduction of new regulatory regimes from 2002 with the requirement to meet new standards both for services and facilities has re-shaped the pattern of provision. However, many commentators would see this style of provision as a dated model for care that places over-emphasis upon dependency

1.8 Residential care in the private sector also has a long history. Until the 1980s much of the residential care provided in the private sector was for those able to meet their own care costs. The unintended consequence of changes in regulations in the early 1980s, so that financial support from public funds was available to those cared for in private residential care homes, was an enormous increase in the sector. Some homes are almost wholly dependent upon residents

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<sup>1</sup> McCafferty P 1994 Living Independently: a Study of the Housing Needs of Elderly and Disabled People, HMSO

<sup>2</sup> A national average of 75% of households with a head 65 years of age or over according to the 2011 Census.

<sup>3</sup> National Assistance Act 1948, section 21.



funded by the local authority and most would say that their fee levels are heavily influenced by local authority levels.

1.9 Some contraction continues to be apparent in parts of the residential care home sector. Many local authorities have withdrawn from the direct provision of residential care, once a major element in the pattern of provision. Whilst some have sold homes to private sector operators or to voluntary sector organisations others have deliberately reduced capacity by closing homes. There has been a marked reduction in provision by very small operators providing less than twenty beds, generally in converted dwelling houses. Capacity within the care home sector is being maintained by the development of larger, purpose built care homes that meet modern standards and operate at a level that supports their viability.

1.10 Like private residential care, private nursing homes have been in existence for many years but only in the last thirty years have they been generally accessible to people needing public funding to meet the cost of their care. The growth of this sector was promoted by two principal factors:

- The availability of public funds to support care costs.
- The general withdrawal of provision for in-patient chronic care of older people within the NHS.

1.11 Some larger nursing homes have been developed specifically as re-provision following the closure of long-stay wards in NHS hospitals. These closures have followed upon a concentration within NHS hospitals on acute care and the conviction that a hospital ward did not provide an appropriate setting for long term care. Nursing Homes generally provide for those who have some need for frequent nursing attention in addition to social care, but a level of care that does not require the constant supervision of a medically qualified person.

1.12 Changes in regulation for both residential and nursing homes in the Care Standards Act (2000) introduced a single registration of Registered Care Home, with the distinction that beds might be registered for the provision of personal care or for the provision of nursing care. Public funding for those allocated to Registered Care Home places is increasingly restricted to those experiencing extreme physical frailty or living with some level of confusional states such as dementia.

1.13 The traditional role of residential care homes has largely been taken over by the hybrid model of Extra Care Housing in its various forms. The debate around how Extra Care might be defined has been carried on between academics, commissioners and providers for most of the past decade<sup>4</sup>. Fundamentally there are two schools of thought:

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<sup>4</sup> See for example Appleton N:Extra Care Housing for Older people, Care Services Improvement Partnership Housing LIN

- Those whose main driving criterion is the capacity of Extra Care to provide an alternative to Residential Care.
- Those whose aspiration is more toward the development of a model that enhances the lifestyle of older people with the capacity to deliver care blended into the background.

1.14 At the extreme end of the first school of thought there are those who feel that allocation to Extra Care should only be available to those with care needs that would otherwise be sufficient to merit placement in residential care. In describing Extra Care their emphasis is upon those facilities that will support the delivery of social care and possibly primary health care: assisted bathing facilities, treatment rooms and so on. In staffing the emphasis is upon on-site care teams as the pre-eminent requirement.

1.15 Those who take the alternative stance emphasise the need to make Extra Care a good place to live, think in terms of a balanced community in relation to care needs, and give prominence to facilities that support an active and positive lifestyle: an exercise suite and spa bath, a coffee bar and perhaps licensed bar, facilities for arts and crafts; all supported by appropriate staffing. Whilst they include the care facilities and staffing they are matched by these lifestyle requirements if the scheme is to be considered as truly Extra Care.

1.16 Whilst declining to offer a definitive description of Extra Care the Department of Health has promoted the development of Extra Care schemes, not least through successive programmes of capital grant. The purpose has been to provide an alternative for those who would otherwise require a place in Registered Care through a model that has predominantly been consistent with the description set out in the preceding paragraph.

1.17 The planning application by Pegasus Life for accommodation for older people in High Street, Lyndhurst, proposes the redevelopment of the site to provide a high quality retirement complex that reflects the philosophy of this model, but for those who are able to live independently.

1.18 The services on offer to residents will provide support designed to assist them in maintaining a degree of independence, and to foster a community spirit. This reflects the philosophy and model of ageing that undergirds the proposed development: that enhances capacity rather than stressing incapacity, that offers a bespoke pattern of support that lengthens the period of independence and manages the transition into higher levels of dependency without compromising dignity and quality of life.

## **2 The case for the development in summary**

2.1 This document sets out the argument for the development of accommodation for older people in Lyndhurst, in the New Forest District of Hampshire and within the New Forest National Park, to augment the existing provision of specialised accommodation for older people in the district. In particular it seeks to address the deficit in provision of Extra Care style accommodation for older home owners in the area.

2.2 New Forest District has a very aged population when compared with England as a whole. People 65 years of age and over make up 28.27% of the population in 2017 compared with the national average in 2017 of 18.09%. By 2035 those 65 years of age and over in New Forest District will make up 35.28% of the local population compared with the national average of 23.28%. By 2035 those 85 years of age and over will make up 8.23% of the population of New Forest District compared with the national average of 4.46%.

2.3 Within the key settlement of Lyndhurst older people make up an even higher proportion of the population and their numbers, especially in the highest age cohorts will increase even more rapidly.

2.4 The primary strategic initiative to meet the rising demand for accommodation and associated care and support appropriate the needs of older people has been the development of Extra Care Housing.

2.5 New Forest District reflects the national trend toward owner-occupation as the dominant tenure for older people. Levels of owner-occupation among older people in New Forest District are very high at around 86% for those between 65 and 74 years of age. In the oldest age group the level of home ownership is depressed by lack of options for owner-occupation in specialised accommodation but remains above 80%.

2.6 Council policies, and those of the New Forest National Park Authority are still largely concerned with the minority who are not owner-occupiers. The scheme proposed by Pegasus Life in Lyndhurst would contribute in responding to the needs and aspirations of older owner-occupiers.

2.7 The various indicators of need modelled in this report all suggest a rising number of people who, in old age, will require specialised accommodation if their levels of dependency are not to be exacerbated with a consequent call upon intensive domiciliary care services or institutional care. The majority of these will be in owner occupation and will increasingly look to maintain their tenure as they seek appropriate combinations of accommodation and care.

2.8 Within Lyndhurst there are substantial numbers of older people experiencing difficulties in maintaining their independence. The environment of a

Pegasus Life scheme is one in which many of these difficulties are mitigated through an appropriately designed environment.

2.9 New Forest District has a supply of specialist accommodation provided for older people which is significantly below the national average. The thorough review of its rented sheltered stock undertaken in 2007 by the District Council, which led to a reduction in the number of units in its management designated as sheltered, clearly impacted on the current level of supply of sheltered housing for rent.

2.10 The overall level of supply of specialised accommodation for older people in New Forest District conceals a huge inequality between people of different tenures. For those older people who are owner occupiers the ratio of provision for retirement housing for sale per thousand is 59.97. For those older people who are renters the comparable ratio per thousand is 207.03. Expressed in this way, as a standardised ratio, it is clear that older home owners in New Forest District are enormously disadvantaged in securing the specialised accommodation they need.

2.11 Whilst the primary responsibility for addressing this deficit lies with New Forest District Council as the Housing Authority their response depends upon the application of planning policies by the New Forest National Park Authority within those parts of the district for which it acts as the LPA.

2.12 The local and national policy context for the promotion of Extra Care type solutions has been set out in the various policy documents developed by Hampshire County Council and its partner district authorities. Whilst this is laudable public policy at both County and District level has failed to propose effective measures for meeting the needs of that majority of older people who are home owners. Whether they wish to pursue the option of Extra Care, or feel that they are more appropriately accommodated in accommodation that promotes their independence their options are limited. In addition to the issues of equity of outcome for older people regardless of location and tenure that this raises it also ignores the benefit to the public purse of allowing those who have housing equity at their disposal to deploy it in accessing solutions to their accommodation and care needs in old age.

2.13 The growth of Extra Care Housing schemes is at the forefront of national and local policy and there is limited provision within this area, especially of such accommodation that is available to home owners who wish to maintain their tenure. The development proposed for Lyndhurst High Street matches the high priority is rightly being given within Hampshire to the development of Extra Care Housing

2.14 The proposed Pegasus Life development in Lyndhurst will make a contribution to providing older owner-occupiers in that part of the New Forest

District with an attractive option to invest in appropriate accommodation that will support and, in most cases, extend their years of independent life. In doing so it will help redress the current inequality in provision between tenures, add to the diversity of provision and mitigate the call upon publicly funded accommodation and care provision in the future.

### **3 The case for the development in national policy and guidance**

3.1 National policy guidance has been consistent through successive administrations. The headlines of this consensus have been to encourage the maintenance of independence for older people for as long as possible, retaining them in their own homes where possible. Where a move is required to meet care needs the preference has been for Extra Care rather than increasing dependency on registered care homes.

#### **Caring for our future: reforming care and support, White Paper** 11 July, 2012<sup>5</sup>

3.2 “Caring for our future: reforming care and support” set out the Coalition Government’s vision for a reformed care and support system. The ambitions for the new system were summarized as follows:

- focus on people’s wellbeing and support them to stay independent for as long as possible
- introduce greater national consistency in access to care and support
- provide better information to help people make choices about their care
- give people more control over their care
- improve support for carers
- improve the quality of care and support
- improve integration of different services

3.3 The White Paper set out the Government’s plan to promote high quality housing to support individual choices. As well as helping more people to adapt their current homes effectively, they announced the creation of a new capital fund, worth £200 million over 5 years, to support the development of more specialised housing for older and disabled people.

3.4 The White Paper asserted that:

“Currently, there is not enough good quality specialised housing to support people who want to downsize as their care needs change. This was a common theme raised by stakeholders during the ‘Caring for our future’ engagement. To help with this problem, the government will stimulate the market for new accommodation options that provide solutions tailored to individual needs”.

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<sup>5</sup> [www.gov.uk/government/uploads/attachment\\_data/file/136422/White-Paper-Caring-for-our-future-reforming-care-and-support-PDF-1580K.pdf](http://www.gov.uk/government/uploads/attachment_data/file/136422/White-Paper-Caring-for-our-future-reforming-care-and-support-PDF-1580K.pdf) (Accessed 11/01/2017) Caring for our future: reforming care and support, White Paper 11 July, 2012

3.5 The White Paper outlined the expectation that local authorities take account of local housing need in their assessments, and for these assessments to influence commissioning plans.

3.6 The government hoped that unnecessary planning barriers to providers of specialised housing are minimised wherever possible, to enable a healthier market that can respond to demand and the needs of the local area. There is an aspiration that the National Planning Policy Framework will simplify the planning system and promote sustainable growth. The White Paper trails the forthcoming industry-led toolkit 'Planning Ahead: Effective Planning for Housing and Care in Later Life' that "will give advice to planning officials at a local level". This was published in December 2012.

**Funding Initiative to stimulate provision and modernization of Specialised Housing for older people.**

October, 2012<sup>6</sup>

3.7 In October, 2012 Care and Support Minister Norman Lamb announced a renewal of funding to encourage the provision, or modernisation, of specialised accommodation for older people. Local authorities were encouraged to bid for part of a £300 million pot of money which will boost the supported housing market and help people grow old in their own homes. The aspiration of the initiative was that it should help create thousands of extra houses and flats specially designed for the needs of disabled and older people who need extra support.

3.8 The Minister recognised that high quality, innovative housing can help people stay independent for longer by allowing them to receive care and practical help in their own home, reducing the need for them to go into care homes. Specialised housing available for owner occupation or shared ownership was a particular target for this initiative.

3.9 The broader benefit of freeing family sized housing in all sectors was endorsed by the recognition that specially designed housing of this kind can give people the option to downsize from a larger home to a more manageable property designed for their needs.

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<sup>6</sup> [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/377023/care\\_and-support\\_specialised\\_housing\\_fund\\_prospectus.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/377023/care_and-support_specialised_housing_fund_prospectus.pdf) (Accessed 11/01/2017). **Care and Support Specialised Housing Fund Prospectus**. October 2012. Department of Health, Homes & Communities Agency.

### **Market assessment of housing options for older people,**

Pannell J, Aldridge H and Kenway P, May 2012, New Policy Institute.<sup>7</sup>

3.10 The study focused on the 7.3 million older households in mainstream or specialist housing in England (excluding care homes) which contain no-one below the age of 55.

- Around one-third of all households are older households. This proportion applies across most regions except for the South West (40 per cent) and London (22 per cent).
- 76 per cent of older households are owner-occupiers and most own outright; 18 per cent are housing association or council tenants, while 6 per cent are private sector tenants.
- 42 per cent of older households aged 55 to 64 are single, and this proportion increases with age.
- About 7 per cent of older households (530,000) live in specialist housing where a lease or tenancy restricts occupation to people aged over 55, 60 or 65. Most of these schemes are provided by housing associations and offer special facilities, design features and on-site staff. Around 10 per cent of specialist dwellings are in schemes offering care as well as support.
- 93 per cent of older people live in mainstream housing. As well as 'ordinary' housing, this includes housing considered especially suitable for older people due to dwelling type (e.g. bungalows), design features (including 'lifetime homes') or adaptations (e.g. stair lifts).

3.11 Supply of and demand for specialist housing: the research confirmed that there is limited choice for older people who want to move to both specialist and alternative mainstream housing, in terms of tenure, location, size, affordability and type of care or support. Housing providers tend to focus on retirement villages and housing with care when thinking about housing that is 'suitable' for older people. Despite the majority of older people owning their homes outright, 77 per cent of specialist housing is for rent and only 23 per cent for sale. There are significant regional variations: the extremes are the North East (only 10 per cent for sale) and the South East (37 per cent for sale).

3.12 There has been recent interest, but slow progress, in developing different housing options for older people and in integrating these within mainstream new housing developments (which could attract older people who prefer to remain in mixed-age communities). There is extensive evidence on what older people are looking for and whether they stay put or move. Two bedrooms is the minimum that most older people will consider, to have enough space for family visitors, a

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[www.npi.org.uk/files/5213/7485/1289/Market\\_Assessment\\_of\\_Housing\\_Options\\_for\\_Older\\_People.pdf](http://www.npi.org.uk/files/5213/7485/1289/Market_Assessment_of_Housing_Options_for_Older_People.pdf) (Accessed 11/01/2017) **Market assessment of housing options for older people**, Pannell J, Aldridge H and Kenway P, May 2012, New Policy Institute.



carer, storage, hobbies, or separate bedrooms for a couple. Analysis of moves by older households in the last five years within the private sector (rent or owner-occupier) shows that 87 per cent move into a dwelling with two or more bedrooms. Yet much specialist housing is small (one-bedroom or sheltered bedsits). Some specialist housing is poorly located and there have been concerns about withdrawal of scheme-based staff. Depending on the method of estimation used, the projected growth in the older population requires an increase in the stock of specialist housing of between 40 per cent (200,000) and 70 per cent (350,000) over the next 20 years.

### **National Planning Policy Framework, March 2012**

3.13 The National Planning Policy Framework encourages local authorities to reflect current demographic trends in their plans so that the needs of particular groups, including older people, may be appropriately met. Authorities are encouraged to:

“To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);”<sup>8</sup>

### **Planning Practice Guidance, March 2014**

3.14 The Planning Practice Guidance issued in 2014 recognised that establishing future need could not be an exact science and suggested that use of secondary sources, such as census data, was the best starting point for projections.:

“Establishing future need for housing is not an exact science. No single approach will provide a definitive answer. Plan makers should avoid expending significant resources on primary research (information that is collected through surveys, focus groups or interviews etc and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base. They should instead look to rely predominantly on secondary data (eg Census, national surveys) to inform their assessment which are identified within the guidance”<sup>9</sup>.

( Paragraph: 014 Reference ID: 2a-014-20140306 Revision date: 06 03 2014)

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<sup>8</sup> NPPF, 2012 Page 13 para 50

<sup>9</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

3.15 Within the section “How should the needs for all types of housing be addressed?” the Guidance draws attention to the importance of taking the needs of older people into account:

“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under occupied<sup>10</sup>.

(Paragraph: 021 Reference ID: 2a-021-20160401 Revision date: 01 04 2016 [See previous version](#))

3.16 In relation to estimating the needs of older people in the section “How should the needs for all types of housing be addressed?” the Guidance offers the suggestion that planners may use one of a number of on line toolkits:

“The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important.<sup>11</sup>”

(Paragraph: 021 Reference ID: 2a-021-20160401 Revision date: 01 04 2016)

### **Care Act, 2014<sup>12</sup>**

3.17 The Care Act 2014 sought to set a new baseline in relation to the provision of social care for adults It re-defines roles, responsibilities and boundaries, setting out arrangements for the new world of personal budgets.

3.18 A priority within the Act was promoting inter-agency collaboration, both between Adult Social Care and Health and with other agencies, such as housing, in statutory, commercial and third sectors. It places a strong emphasis on services that contribute to well-being and delay or divert the requirement for more intensive forms of care.

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<sup>10</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>11</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>12</sup> [www.legislation.gov.uk/ukpga/2014/23/contents/enacted](http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted) (Accessed 11/01/2017) **Care Act 2014**

3.19 Under the Care Act, local authorities have new functions.

- It makes clear that local authorities must arrange services that help prevent or delay people deteriorating
- Local authorities will need to provide comprehensive information and advice about care and support services in their local area. This will help people to understand how care and support services work locally, the care and funding options available, and how people can access care and support services.
- Requires local authorities to help develop a market that delivers a wide range of sustainable high-quality care and support services that will be available to their communities.

3.20 The Act gives local authorities a new legal responsibility to provide a care and support plan (or a support plan in the case of a carer).

- For the first time, the Act provides people with a legal entitlement to a personal budget, which is an important part of the care and support plan. This adds to a person's right to ask for a direct payment to meet some or all of their needs.
- Even when an assessment says that someone does not have needs that the local authority should meet, the local authority must advise people about what needs they do have, and how to meet them or prevent further needs from developing.
- It must also provide an independent advocate to help the person take part in the planning and review process, if that person would otherwise have substantial difficulty in doing so.
- The local authority also has a legal responsibility to review the plan to make sure that the adult's needs and outcomes continue to be met over time.

3.21 There are several key themes that run through the Act and underpin the proposed changes. These include:

- More choice and control over care and support
- Clarifies what they can expect from the care system
- Promotion of independence and wellbeing
- Preventing or delaying care and support needs from becoming more serious

- Role of market shaping to ensure a good range of services and providers
- Promoting co-operation and integration across health & social care
- Equal rights for carers

### **Fixing our broken housing market. February 2017<sup>13</sup>**

3.22 In relation to the assessing of housing requirements the White Paper asserts that the current system is complex and lacks transparency. The need for a more consistent approach and one that takes account of the needs of particular groups within each community with older people being particularly mentioned:

“The current approach to identifying housing requirements is particularly complex and lacks transparency. The National Planning Policy Framework (NPPF) sets out clear criteria but is silent on how this should be done. The lack of a standard methodology for doing this makes the process opaque for local people and may mean that the number of homes needed is not fully recognised. It has also led to lengthy debate during local plan examinations about the validity of the particular methodology used, causing unnecessary delay and wasting taxpayers’ money. The Government believes that a more standardised approach would provide a more transparent and more consistent basis for plan production, one which is more realistic about the current and future housing pressures in each place and is consistent with our modern Industrial Strategy. This would include the importance of taking account of the needs of different groups, for example older people”. (Para 1.2)

3.23 In a subsequent section further reference is made to the need to take account of the needs of an ageing society

“Whatever the methodology for assessing overall housing requirements, we know that more people are living for longer. We propose to strengthen national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people.” (Para 1.16)

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<sup>13</sup>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/590464/Fixing\\_our\\_broken\\_housing\\_market\\_-\\_print\\_ready\\_version.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf)

## **Section Summary**

There is a sustained direction in legislation and guidance, supported by research evidence, that aspires to allow a higher proportion of older people to remain in their existing homes or, where that is either not desirable or practicable, for them to be supported in a “home-like” environment.

If the aspiration is to reduce dependence upon institutional care then housing based solutions become pivotal, explaining the centrality of models like Extra Care in government thinking.

The 2014 Care Act establishes the strategic obligations of the local authority in relation to ensuring that a range of provision is available to meet those needs which it has a statutory obligation to assess.

## 4 The local policy context

4.1 The local policy context is set partly by the planning, development and housing policies articulated by the New Forest National Park Authority in its role as the Local Planning Authority and by Hampshire County Council in discharge of its responsibility as the Welfare Authority. As it retains its role as the Housing Authority the policies adopted by the New Forest District Council in relation to housing are also relevant.

4.2 The document “Partnership for Extra Care Housing in Hampshire”, published in December 2008 and reflecting the conclusions and commitments of the County Council and the eleven Borough and District Councils of Hampshire recognises the need for new and innovative provision:

*Hampshire faces a demographic challenge in the coming decades with a substantial rise forecast in its’ older population. By 2012 it is anticipated that the 85+ age group will rise by 23.4%. This generation of older people expect choice and the opportunity to adopt a positive lifestyle in their old age. Integral to this is the desire to live in their own homes for as long as possible.*

*This increase in the number of individuals attaining advanced old age means there will also be a steep rise in the number of those suffering the range of chronic conditions associated with advanced old age, such as reduced mobility, mental confusion and a reduction in the capacity for independent living. People will require appropriate accommodation, support and care if their independence, quality of life and wellbeing are to be preserved.*

*The challenge for social care commissioners and housing authorities at both County and District / Borough level lies in shaping the provision of housing support and care for older people, in a way which offers choice and ensures the aspirations and needs of an ageing population can be met.*

These conclusions are entirely congruent with the conclusions drawn from the evidence presented in this study.

4.3 The “Partnership for Extra Care Housing in Hampshire” document is set within a context of policy and development work carried out in Hampshire over the past decade. We make reference to the most relevant:

### **Hampshire Local Area Agreement 2008 – 11**

The agreement sets targets and outcomes in relation to providing affordable housing, promoting independent living for vulnerable people and improving the health and wellbeing of people in Hampshire..

- Priority D: Improve access to housing and accommodation NI 187  
Fuel Poverty
- Priority F: Health and Wellbeing:  
NI 139 : The extent to which older people receive the support they need to live independently at home
- NI 142 : % of vulnerable people who are supported to maintain independent living.
- (See Also NI 125,129,131,134, 136,137)

### **Hampshire Corporate Strategy**

The development of specialised housing for older people supports the corporate objectives:

- Hampshire safer and more secure for all (Obj. 1)  
Specialised housing offers older people the safety of care and support available on-site where they live and also the security of tenure that they would not enjoy in residential care.
- Maximise wellbeing (Obj. 2)  
Specialised housing promotes independent living and empowers older people who might otherwise have required residential care. Older people living in extra care schemes also have access to additional sources of income and tend to retain a greater level of disposable income than those in residential care.
- Enhance quality of place (Obj. 3)  
New build housing designed specifically to meet their needs offers older people a higher standard of personal accommodation than they would be likely to enjoy in residential care. They also have access to a range of communal facilities that they would be unlikely to have access to otherwise

### **Hampshire Corporate Business Plan 2008/09**

New build specialised housing for older people contributes to the achievement of a number of business plan targets including:

- Implementing schemes that provide care at home and prevent hospital admissions.
- Expanding the use of telecare
- Promoting independent living and inclusion.
- Providing an alternative to residential care.
- Providing modern day care facilities.

### **Putting People First - Shaping your future, choosing your care.**

This document examines future services for adults in need of support and care. It places an emphasis on dignity, choice and control over the support they receive – all philosophies adopted by Pegasus Life in their developments.

### **Older Persons Wellbeing Strategy**

This strategy focuses on housing and home, neighbourhood, social activities and networks, getting out and about, income, information, health and healthy living. Accommodation and facilities of the kind provided in Pegasus Life developments has an impact on many of these issues.

### **Adult Services Modernisation Strategy**

The strategy sets out a vision to develop alternative ways of delivering care through integrated work with partners. It emphasises the development of housing-based options for vulnerable people. Appropriate specialised housing to meet the needs of a range of older people in all tenures housing is a key aspect in delivering the aspirations of this strategy.

### **Hampshire County Council Adult Services Older People and Physical Disabilities Service Plan 2008/9**

Aims include :

- choice and control,
- maximise independence,
- provide safe and supportive services
- enable community support and development.

Pegasus Life developments contribute to all these aims.

4.4 The document “Partnership for Extra Care Housing in Hampshire” recognises the importance of structuring future provision to match the pattern of tenure among older people. Investment to deliver the strategy has so far been more successful in developing Extra Care Housing for rent than for home ownership. The proposed provision by Pegasus Life in Lyndhurst will help re-balance that outcome and reflect the concerns set out in the following paragraph of the document:

*Reflecting the high percentage of home ownership within the County, it is important that a choice of tenure is provided. A range of options will be developed so that people are able to rent, own or part-own an apartment or bungalow within a scheme of similar units. A tenancy or leasehold*



*agreement will ensure security of tenure. Schemes developed by the County in partnership with housing providers will primarily be affordable housing, although a proportion of open market units in each development may be provided as a means of ensuring the initial viability of the scheme.*

Whilst the document is written to support the development of Extra Care its concerns apply equally to all forms of specialised accommodation provided for older people. As the analysis of current supply contained in subsequent sections will demonstrate this is currently heavily skewed toward rental.

4.5 The document also recognises the importance of scale of development to the viability of the facilities and services provided. The proposals for the Pegasus Life development reflect this concern so that long-term viability may be secured.

*To ensure the financial viability of schemes research indicates the optimum number of units to be between 45 and 60 units. This enables the establishment and maintenance of a vibrant community with a wide range of needs, allowing the appropriate levels of care and support to be provided on a cost effective basis*

4.6 The New Forest District Housing Strategy 2004-2007 sets out the legacy position in relation to the sheltered housing stock owned and managed by the local authority:

*The sheltered housing service comprises the management of some 26 separate schemes of warden accommodation totalling over 700 individual dwellings. In the past this has been managed by resident sheltered housing managers who manage individual schemes and live on site. Cover has been provided by a number of mobile sheltered housing managers. Over the years it has become increasingly difficult to recruit sheltered housing managers who are prepared to live on site in what is essentially tied accommodation. For this reason it has been necessary when vacancies occur to recruit sheltered housing managers who live off site. Currently as a result of this policy only 6 sheltered housing managers live on site. It is proposed to make all sheltered housing managers non-residential*

4.7 Subsequent developments have continued with that direction of travel for the New Forest District Council social rented stock:

- The Authority established that many residents who had been inappropriately allocated to sheltered housing.
- A number of schemes were designated as full (category Two) sheltered schemes when in fact they were simply blocks of flats or bungalow with

a dispersed alarm system. There were around twenty such schemes accommodating almost seven hundred people with widely differing levels of need.

- The Authority decommissioned 330 units by removing services and moving people to ensure the best match between their needs and the services and facilities provided
- Support is provided by managers working in three patches in rotation on a ratio of one manager to fifty sheltered units.

4.8 Beyond noting the increase in older person households the Core Strategy Development Plan 2007 has little constructive to say about responding to the needs associated with that increase. It does however commend flexibility in the design of new build accommodation:

*Small properties, in particular flats, often provide inflexible accommodation which may only meet a household's needs for a short period. .... As the emphasis must be on meeting local housing needs, a higher proportion of new dwellings should be capable of providing flexible accommodation to adapt to the changing needs of households.*

The Pegasus Life development at Lyndhurst would provide flexibility in meeting the changing needs of residents as they age in place.

#### **New Forest National Park Local Development Framework Core Strategy and Development Management Policies DPD December 2010<sup>14</sup>**

4.9 The Core Strategy document sets out its key purpose and rehearses the history of the creation of the New Forest National Park:

“The Core Strategy is a key part of the Authority’s Local Development Framework and sets out the planning framework for the National Park for the period up to 2026. The New Forest was designated as a National Park in 2005 and this Core Strategy provides for the first time a consistent set of planning policies covering the whole of the National Park, including a number of more detailed development management policies to guide planning decisions in the Park.”

4.10 The clear emphasis on meeting the needs of local people is made explicit in the strategy with meeting local need being a key determinant in relation to permitted development:

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<sup>14</sup> [http://www.newforestnpa.gov.uk/downloads/download/121/core\\_strategy\\_by\\_chapter](http://www.newforestnpa.gov.uk/downloads/download/121/core_strategy_by_chapter)

“In preparing this strategy, the Authority is seeking 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.”

4.11 A vision for the role of development within the National Park is clearly articulated:

“The limited development that has taken place within the National Park has been focussed on catering for the socio-economic needs of local people rather than meeting external demand. Small scale housing development within the defined villages of Ashurst, Brockenhurst, Lyndhurst and Sway has provided a mix of open market and affordable housing, with rural exceptions schemes having provided local affordable housing in settlements across the rest of the National Park. The inherent characteristics and local distinctiveness of the individual villages has been retained and enhanced through the highest standards of design that respect the natural and built heritage of the Park. The rural economy has been supported by small scale employment development that does not conflict with the special qualities of the National Park.”

4.12 The objectives of the strategy focus on affordability in housing, sustainability and the well-being of communities within the Park:

- Promote affordable housing to meet local needs and maintain the vibrant communities of the National Park.
- Develop a diverse and sustainable economy that contributes to the well-being of local communities throughout the Park.

4.13 The Strategy makes explicit reference to appropriately scaled developments to meet local needs within the four defined villages of Ashurst, Brockenhurst, Lyndhurst and Sway:

“Appropriate small scale employment and housing development to meet the needs of the local communities will be supported in the four current defined villages of Ashurst, Brockenhurst, Lyndhurst and Sway, continuing policies in the previous Local Plan. It will be important to maintain the vitality and character of these villages, accepting that together they provide homes for nearly one third of all National Park residents, have the broadest range of community facilities, services and local employment opportunities and have relatively good transport links, including public transport. Any new development will be carefully designed and of a scale which will contribute to the essentially rural character of the villages”

4.14 There is a strong emphasis on the need for affordable housing. We shall demonstrate that in relation to older people the imbalance in supply as between tenures may require a more careful examination of priorities in relation to the encouragement of developments to meet the needs of this age group within local communities.

“Due to the high house prices in the New Forest, the level of local need in the area, the low rate of development, and the significant existing dwelling stock, the Authority will seek at least 50% of new residential developments within the defined villages to be for local affordable housing needs. The remainder will be open market housing.”

4.15 The Core Strategy does recognise the importance of accessible design in new dwellings to meet the needs of an ageing population:

“Given the forecasted ageing population in the New Forest during the period of the Core Strategy and beyond, the Core Strategy, in line with Government guidance aims to encourage ‘lifetime homes’. These are homes that are adaptable to meet a lifetime’s changing needs, and the Lifetime Homes standards comprise 16 different features that facilitate this. Lifetime Homes Standards will be made a mandatory part of the Code for Sustainable Homes to encourage progressively increased take-up in new build projects. The Government’s aspiration is that by 2013 all new homes will be being built to Lifetime Homes Standards.”

4.16 Recognising that the District Council retains its role as the Housing Authority the New Forest National Park Authority role is described as follows:

“The Authority’s primary role is to guide appropriate development to meet local housing needs and in particular ensure affordable housing is more readily available for those with a local connection. Small scale development will continue to be required within the National Park to meet the needs of local communities and contribute towards sustaining local services.”

## **Key Points**

- The various documents that provide the foundations for a strategic approach to provision for an ageing population in Hampshire all emphasise the rate of growth in the population of older people in the county.
- The documents deploy persuasive arguments in support of the expansion of provision of places in extra care and may be applied equally to argue for such provision available to home owners for purchase.
- The imbalance in current provision and the need to provide more adequately for older owner occupiers is widely acknowledged in the strategic responses to the needs of an ageing population in Hampshire.
- The rigorous changes made in the provision of social rented sheltered housing in the New Forest District to ensure its relevance and sustainability have not been matched by initiatives to meet the needs of older home owners.

## 5 The demography of the New Forest District Council and of Lyndhurst within the New Forest National Park

5.1 In 2017 the New Forest District is projected to have fifty-one thousand and four hundred people who are sixty-five years or more. This is projected to rise to almost sixty-seven thousand by 2030.

**Table One Population aged 65 and over, projected to 2035 New Forest**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
People aged 65-69	13,300	12,600	13,400	15,400	15,200
People aged 70-74	13,100	14,100	12,600	13,500	15,600
People aged 75-79	9,100	10,500	13,300	12,000	13,000
People aged 80-84	7,400	7,800	9,300	11,900	10,800
People aged 85-89	5,100	5,400	6,100	7,400	9,600
People aged 90 and over	3,400	3,700	4,400	5,500	7,000
<b>Total population 65 and over</b>	<b>51,400</b>	<b>54,100</b>	<b>59,100</b>	<b>65,700</b>	<b>71,200</b>

(Source: Office of National Statistics Census 2016)

5.2 As Table Two shows the highest rates of increase are among those in the highest age groups with the number of those who are ninety years of age or more projected to increase by 106% over the period from 2017 to 2035. Overall the population of those sixty-five years or above will increase by 39%.

**Table Two Population aged 65 and over, projected to 2035 New Forest**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
People aged 65-69	0	-5%	1%	16%	14%
People aged 70-74	0	8%	-4%	3%	19%
People aged 75-79	0	15%	46%	32%	43%
People aged 80-84	0	5%	26%	61%	46%
People aged 85-89	0	6%	20%	45%	88%
People aged 90 and over	0	9%	29%	62%	106%
<b>Total population 65 and over</b>	<b>0</b>	<b>5%</b>	<b>15%</b>	<b>28%</b>	<b>39%</b>

(Source: Office of National Statistics Census 2016)

5.3 Table Three shows that the New Forest District has a strikingly elderly population. Those sixty-five and above represent 28.27% of the total population of the district in 2017, compared with a national average for England in the same

year of 18.09%. The differential is maintained and increases slightly by 2035 when people sixty-five years of age and over will make up more than a third of the total population of the district at 35.25%, compared with less than a quarter in England as a whole at just 23.28%

**Table Three                      Total population, population aged 65 and over and population aged 85 and over as a number and as a percentage of the total population, projected to 2035  
New Forest**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
Total population	181,800	185,200	191,100	196,700	201,800
Population aged 65 and over	51,400	54,100	59,100	65,700	71,200
Population aged 85 and over	8,400	9,100	10,500	12,900	16,600
Population aged 65 and over as a proportion of the total population	28.27%	29.21%	30.93%	33.40%	35.28%
Population aged 85 and over as a proportion of the total population	4.62%	4.91%	5.49%	6.56%	8.23%

(Source: Office of National Statistics Census 2016)

5.4 When we look at the oldest cohorts, those eighty-five years of age or above then the same picture emerges: 4.62% of the population of the district fall into this oldest age category in 2017, rising to 8.23% by 2035. This compares with 2.46% and 4.46% for England as a whole.

5.5 The significance of these threshold ages is to be found in the convergence of dependency and chronological age. At age sixty five the lifetime risk of developing a need for care services to assist with personal care tasks is 65% for men and 85% for women<sup>15</sup>. The incidence of need for assistance increases substantially with age and is highest for those eighty five years of age and above. As the following tables modelling levels of dependency and need for service demonstrate this increase in the ageing of the population has a direct impact on the need for care and support services and appropriate accommodation.

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<sup>15</sup> David Behan, Director General for Adult Social Care, department of Health, presentation to a King's Fund Seminar 21<sup>st</sup> July 2009

**Table Four**                      **Total population, population aged 65 and over and population aged 85 and over as a number and as age of the total population, projected to 2035 – England**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
Total population	55,640,400	56,862,300	58,769,500	60,524,200	62,104,300
Population aged 65 and over	10,063,400	10,608,700	11,727,200	13,166,900	14,459,300
Population aged 85 and over	1,369,700	1,479,000	1,757,700	2,148,600	2,770,700
Population aged 65 and over as a proportion of the total population	18.09%	18.66%	19.95%	21.75%	23.28%
Population aged 85 and over as a proportion of the total population	2.46%	2.60%	2.99%	3.55%	4.46%

(Figures may not sum due to rounding. Office of National Statistics Crown copyright 2016)

5.6 We have drawn out data to establish the profile of older people living in the key settlement of Lyndhurst within the New Forest National Park LPA. For reasons relating to the small area data used to model these populations the years do not match those used in the preceding tables but the trend is clear. In 2016 those sixty-five years or over already made up 29.92% of the total population of Lyndhurst, compared with 27.62% for the whole of the New Forest District Council area in 2015. The disparity is maintained in the 2031 figure for Lyndhurst when those sixty-five years of age and over will make up 38.32% of the total population, compared with the 2030 figure for the New Forest District Council area of 33.86%.

5.7 This is a significantly aged population and with the reductions shown in the pre-retirement population shown in Table Six and the very substantial increase in those in the oldest cohorts, again higher than those for the New Forest District Council area as a whole, this is a population projected to be ageing at a very significant rate, with the number of those eighty-five years of age or more set to increase by close to 250% between 2011 and 2036..



**Table Five Population profile for Lyndhurst, 2011-2036<sup>16</sup>**

	Age group	2011	2016	2021	2026	2031	2036
Lyndhurst	0-54	1,741	1,725	1,697	1,691	1,704	1,723
	55-64	476	460	511	525	485	449
	65-74	372	453	465	462	517	536
	75-84	311	330	386	471	489	495
	85+	129	150	172	202	255	320
	Total	3,029	3,118	3,232	3,351	3,450	3,525

**Table Six Percentage change for Lyndhurst 2011-2030**

	Age group	2011-16	2016-21	2021-26	2026-31	2031-36	2011-36
Lyndhurst	0-54	-0.9%	-1.6%	-0.4%	0.8%	1.1%	-1.0%
	55-64	-3.3%	10.9%	2.9%	-7.8%	-7.3%	-5.6%
	65-74	21.8%	2.7%	-0.7%	12.0%	3.7%	44.2%
	75-84	6.0%	17.2%	22.0%	3.9%	1.2%	59.3%
	85+	15.9%	15.3%	17.3%	26.1%	25.5%	148.2%
	Total	2.9%	3.7%	3.7%	2.9%	2.2%	16.4%

<sup>16</sup> Data on usually resident population from the 2011 Census was used to determine the proportion of people within New Forest District Council living in each of the settlements (by age group) and these proportions were then applied to ONS 2012-based population projections for the same age groups.

The tables summarise the results for selected years for Lyndhurst, 2011 figures are estimates from the Census, with other years being estimates derived from ONS projections.

## **Key Points**

- New Forest District has a very aged population when compared with England as a whole. People 65 years of age and over make up 28.27% of the population in 2017 compared with the national average in 2017 of 18.09%.
- By 2035 those 65 years of age and over in New Forest District will make up 35.28% of the local population compared with the national average of 23.28%
- By 2035 those 85 years of age and over will make up 8.23% of the population of New Forest District compared with the national average of 4.46%.
- The well established connection between chronological age and the need for specialised accommodation and health and care services makes these high and increasing levels very significant for the sustainability of local services.
- Within the key settlement of Lyndhurst and older people make up an even higher proportion of the population and their numbers, especially in the highest age cohorts will increase even more rapidly.

## 6 Indicators of dependency

6.1 Table Seven shows the modelling of those older people who are likely to experience difficulty with at least one task necessary to maintain their independence. As is clearly seen the incidence of difficulty rises sharply with age and is projected to increase over time as the population of those in the highest age groups increases. Between 2017 and 2035 the number of those experiencing such difficulties is projected to increase by around 50%.

**Table Seven**      **People aged 65 and over unable to manage at least one domestic task on their own, by age group projected to 2035 - New Forest**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
Males aged 65-69 unable to manage at least one domestic task on their own	1,024	976	1,040	1,184	1,168
Males aged 70-74 unable to manage at least one domestic task on their own	1,302	1,407	1,260	1,365	1,575
Males aged 75-79 unable to manage at least one domestic task on their own	1,548	1,800	2,232	2,052	2,232
Males aged 80-84 unable to manage at least one domestic task on their own	1,353	1,435	1,763	2,255	2,091
Males aged 85 and over unable to manage at least one domestic task on their own	2,108	2,380	2,856	3,672	4,760
Females aged 65-69 unable to manage at least one domestic task on their own	1,932	1,820	1,932	2,240	2,212
Females aged 70-74 unable to manage at least one domestic task on their own	2,760	2,960	2,640	2,800	3,240
Females aged 75-79 unable to manage at least one domestic task on their own	2,548	2,860	3,692	3,276	3,536
Females aged 80-84 unable to manage at least one domestic task on their own	2,747	2,881	3,350	4,288	3,819

Females aged 85 and over unable to manage at least one domestic task on their own	4,346	4,592	5,166	6,150	7,872
<b>Total population aged 65 and over unable to manage at least one domestic task on their own</b>	<b>21,668</b>	<b>23,111</b>	<b>25,931</b>	<b>29,282</b>	<b>32,505</b>

Figures may not sum due to rounding. Office of National Statistics Crown copyright 2016  
 Tasks include: household shopping, wash and dry dishes, clean windows inside, jobs involving climbing, use a vacuum cleaner to clean floors, wash clothing by hand, open screw tops, deal with personal affairs.

6.2 Table Eight suggests that the number of those who will be unable to manage at least one personal care task will also increase by approximately fifty percent between 2017 and 2035.

**Table Eight                      People aged 65 and over unable to manage at least one personal care task on their own, by age group projected to 2035 – New Forest**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
Males aged 65-69 unable to manage at least one self-care activity on their own	1,152	1,098	1,170	1,332	1,314
Males aged 70-74 unable to manage at least one self-care activity on their own	1,178	1,273	1,140	1,235	1,425
Males aged 75-79 unable to manage at least one self-care activity on their own	1,247	1,450	1,798	1,653	1,798
Males aged 80-84 unable to manage at least one self-care activity on their own	1,089	1,155	1,419	1,815	1,683
Males aged 85 and over unable to manage at least one self-care activity on their own	1,581	1,785	2,142	2,754	3,570
Females aged 65-69 unable to manage at least one self-care activity on their own	1,449	1,365	1,449	1,680	1,659
Females aged 70-74 unable to manage at least one self-care activity on their own	2,070	2,220	1,980	2,100	2,430

Females aged 75-79 unable to manage at least one self-care activity on their own	1,911	2,145	2,769	2,457	2,652
Females aged 80-84 unable to manage at least one self-care activity on their own	2,173	2,279	2,650	3,392	3,021
Females aged 85 and over unable to manage at least one self-care activity on their own	3,922	4,144	4,662	5,550	7,104
<b>Total population aged 65 and over unable to manage at least one self-care activity on their own</b>	<b>17,772</b>	<b>18,914</b>	<b>21,179</b>	<b>23,968</b>	<b>26,656</b>

Figures may not sum due to rounding. . Office of National Statistics Crown copyright 2016  
Activities include: bathe, shower or wash all over, dress and undress, wash their face and hands, feed, cut their toenails

6.3 In the past few years social care services funded from public funds have focused on supporting those who have difficulty with tasks of personal care. The projected increase in the numbers of older people experiencing difficulty therefore impacts directly on the likely demand for services.

**Table Nine People aged 65 and over with a limiting long-term illness, by age, projected to 2035 – New Forest**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
People aged 65-74 whose day-to-day activities are limited a little	5,254	5,314	5,175	5,752	6,130
People aged 75-84 whose day-to-day activities are limited a little	4,932	5,470	6,755	7,144	7,114
People aged 85 and over whose day-to-day activities are limited a little	2,383	2,582	2,979	3,660	4,710
<b>Total population aged 65 and over with a limiting long term illness whose day-to-day activities are limited a little</b>	<b>12,570</b>	<b>13,366</b>	<b>14,909</b>	<b>16,556</b>	<b>17,954</b>
People aged 65-74 whose day-to-day activities are limited a lot	2,618	2,648	2,578	2,866	3,054
People aged 75-84 whose day-to-day activities are limited a lot	3,413	3,785	4,675	4,943	4,923

People aged 85 and over whose day-to-day activities are limited a lot	3,020	3,271	3,774	4,637	5,967
<b>Total population aged 65 and over with a limiting long term illness whose day-to-day activities are limited a lot</b>	<b>9,050</b>	<b>9,704</b>	<b>11,027</b>	<b>12,446</b>	<b>13,944</b>

Figures may not sum due to rounding. . Office of National Statistics Crown copyright 2016

6.4 An increase in the proportion of the population living into advanced old age also impacts on the demands made upon health services. Table Nine projects an increase in the numbers of those experiencing a long-term limiting illness. This shows that whilst the overall increase for those over sixty five years of age is around 47.50% the rate for those in the highest age group; those eighty five years of age and above, is higher at around 242%

6.5 A key indicator for specialised housing in old age is difficulty with activities related to mobility. Good design can mitigate these problems and well designed retirement housing has a key role in relieving the pressure that such problems otherwise exert on services providing for higher levels of dependency. Table ten shows the very substantial number of older people in the district council area who are experiencing such difficulties.

**Table Ten People aged 65 and over unable to manage at least one mobility activity on their own, by age, projected to 2035 – New Forest**

	<b>2017</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
People aged 65-69 unable to manage at least one activity on their own	1,133	1,073	1,141	1,312	1,295
People aged 70-74 unable to manage at least one activity on their own	1,724	1,854	1,656	1,770	2,046
People aged 75-79 unable to manage at least one activity on their own	1,545	1,755	2,235	2,007	2,172
People aged 80-84 unable to manage at least one activity on their own	1,783	1,877	2,224	2,846	2,571
People aged 85 and over unable to manage at least one activity on their own	3,735	4,025	4,620	5,640	7,250

<b>Total population aged 65 and over unable to manage at least one activity on their own</b>	<b>9,920</b>	<b>10,584</b>	<b>11,876</b>	<b>13,575</b>	<b>15,334</b>
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Office of National Statistics Crown copyright 2016. Activities include: going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed

6.6 Modelling such prevalence on smaller populations provides less robust evidence than in larger populations but looking at the older population of Lyndhurst we offer in Table Eleven some estimates in relation to a focused range of indicators. Some individuals may experience difficulty with more than one task and those with the most severe functional difficulties may experience all of these difficulties. They are indicative of a significant proportion of older people living in this local community within the New Forest National Park who have a need for specialised housing of one kind or another.

6.7 The forward projection of these numbers to 2036 show very substantial increases in the requirement for all forms of accommodation and care to meet the needs of those living into advanced old age.

**Table Eleven      Difficulty with specific tasks essential to the maintenance of independence among people seventy-five years of age and over in Lyndhurst, 2011 and 2036**

	2011	2036
Difficult or impossible to get out of doors and walk down the road	100	215
Difficult or impossible to get up and down steps and stairs	93	173
Difficult or impossible to undertake grocery shopping	133	255
Difficult or impossible to manage bathing, showering or washing all over unaided	68	130
Difficult or impossible to manage using the toilet unaided	47	109

## **Key Points**

- Those having difficulty with one or more domestic tasks will increase between 2017 to 2035 from 21,668 to 32,505. A failure to manage these tasks often persuades older people, or their relatives, of the need to move from general housing.
- Similarly those experiencing difficulty with at least one tasks of personal care is projected to rise from 17,772 in 2017 to 26,656 in 2035 with a similar consequence.
- Within Lyndhurst there are substantial numbers of older people experiencing difficulties in maintaining their independence.
- Pegasus Life developments provide an environment in which many of these difficulties are mitigated through an appropriately designed environment.
- This reduces the demand for early transfer to more complex and expensive forms of provision and maintains the values of independence and quality of life for older people.



## 7 Tenure

7.1 Next to demographic trends toward an ageing of society the most significant factor shaping the future of provision for older people is the shift in tenure pattern. Owner-occupation has become the tenure of the majority of older people.

7.2 Traditionally local authorities have been primarily focused on the provision of social rented housing. Although the past two decades have seen a shift away from direct provision by local authorities concerns for this sector have tended to dominate thinking and resources.

7.3 There has been an implicit assumption that older people who are home owners can, through the deployment of the equity represented by their current home, make provision themselves for their accommodation in old age.

7.4 Table Twelve demonstrates the high levels of owner occupation now to be found among older people in the area of New Forest District Council . In those approaching old age and in early old age less than fifteen percent are in tenures other than home ownership.

**Table Twelve      Proportion of population by age cohort and by tenure, year 2011 New Forest**

	<b>People aged 65-74</b>	<b>People aged 75-84</b>	<b>People aged 85 and over</b>
Owned	86.12%	85.71%	82.56%
Rented from council	6.00%	6.16%	6.94%
Other social rented	2.14%	2.80%	3.72%
Private rented or living rent free	5.73%	5.34%	6.77%

Figures may not sum due to rounding. . Office of National Statistics Crown copyright 2014

7.5 The very slight fall in ownership in the older cohorts is explained partly through inheritance: when these people were younger home ownership was not at its current level of prevalence, and partly that homeowners in these cohorts who have needed to find specialist accommodation and care have not had options available to them that allowed them to maintain their tenure.

7.6 Table Thirteen gives the average figures for England from which it may be seen that levels of owner occupation among older people in the New Forest District Council area are well above national averages in all age groups.

**Table Thirteen      Proportion of population aged 65 and over by age and tenure, i.e., owned, rented from council, other social rented, private rented or living rent free, year 2011 – England**

	<b>People aged 65-74</b>	<b>People aged 75-84</b>	<b>People aged 85 and over</b>
Owned	76.34%	74.84%	68.20%
Rented from council	9.54%	10.42%	11.99%
Other social rented	7.75%	8.79%	11.66%
Private rented or living rent free	6.36%	5.95%	8.14%

Figures may not sum due to rounding. . Office of National Statistics Crown copyright 2014

## **Key Points**

- New Forest District reflects the national trend toward owner-occupation as the dominant tenure for older people.
- Levels of owner-occupation among older people in New Forest District are very high at around 86% for those between 65 and 74 years of age.
- In the oldest age group the level of home ownership is depressed by lack of options for owner-occupation in specialised accommodation but remains above 80%.
- Council policies, and those of the New Forest National Park Authority are still largely concerned with the minority who are not owner-occupiers.
- The proposed Pegasus Life scheme in Lyndhurst would contribute in responding to the needs and aspirations of older owner-occupiers.

## **8 The supply of specialist accommodation for older people**

8.1 New Forest District has a supply of specialist accommodation provided for older people in sheltered housing for rent and retirement housing for leasehold sale which is significantly below the national average.

8.2 Taking the various forms of sheltered and retirement housing offered either to rent or to buy there appear to be currently just over two thousand units of accommodation. To achieve comparability this supply has been expressed as a ratio to the size of the population of older people in the district.

8.3 Various thresholds have been used but that which is generally recognised as having the greatest relevance is that for the number of people seventy five years of age or older. There are around eighty-three units in any tenure per thousand of the population in this age category.

8.4 This compares with benchmark figures derived from the data base of the Elderly Accommodation Counsel, which is the source relied upon by the Department for Communities and Local Government. These provide a national average ratio of provision of 118.5 per thousand of those 75 years of age and over.

8.5 We have noted above the thorough review of its rented sheltered stock undertaken in 2007 by the District Council which led to a reduction in the number of units in its management designated as sheltered. This has clearly influenced the current level of supply.

8.6 Although the ratio of units available to those in social renting to those seeking to maintain home ownership is more representative of the balance between tenures in the general population of older people than in many other parts of the country there is still a marked disparity. With 1,269 units of retirement housing for sale for a population of home owners of seventy-five years of age or more of approximately 21,160 the ratio of provision for retirement housing for sale per thousand is 59.97.<sup>17</sup>

8.7 The comparative figure for those seventy-five years of age or more who are in rented tenures the ratio per thousand is 207.03. (795 units for approximately 3,840 persons seventy-five years of age or more in tenures other than home ownership.)

8.8 This suggests that the current rate of provision favours those in tenures other than home ownership with more than three times as many units available to them in sheltered and retirement housing than are currently available for their

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<sup>17</sup> Among persons 75-84: 16,500 persons, 85.71% are home owners + persons 85+: 8,500 persons, 82.56% are home owners = 21,160 home owners 75+.

peers who are home owners. This is inspite of the relatively high level of provision on leasehold retirement accommodation in the district.

8.9 It is clear from the levels of home ownership in succeeding cohorts that the level of those in old age who are home owners will continue to rise. The majority of those entering old age as home owners wish to maintain that tenure and there are sound economic arguments for the individual and for the public purse to support that.

8.10 To enable older people to exercise that choice, to address the disparity in opportunity to access specialist housing to meet the needs of older people for specialist accommodation, and to encourage older people to make a capital investment in their accommodation in old age the local authority needs to facilitate increased leasehold provision of suitable accommodation.

**Table Fourteen Provision of place for older people in New Forest District – 2017**

	Number of units/places	Per 1,000 of the population 65 years and over (51,400)	Per 1,000 of the population 75 years and over (25,000)	Per 1,000 of the population 85 years and over (8,500)
Age Exclusive housing to rent	272	5.29	10.88	32.00
Sheltered Housing to rent	339	6.59	13.56	39.88
Enhanced Sheltered Housing to rent	14	0.27	0.56	1.65
Extra Care Housing to rent	170	3.3`1	6.80	20.0
<b>Total housing to rent - all types</b>	<b>795</b>	<b>15.47</b>	<b>31.80</b>	<b>93.53</b>
Age Exclusive for leasehold	70	1.36	2.80	8.24
Sheltered Housing for leasehold	1,157	22.51	46.28	136.18

Enhanced Sheltered Housing for Leasehold	0	0	0	0
Extracare Housing for leasehold	42	0.82	1.68	4.94
<b>Total Housing for Leasehold - all types</b>	<b>1,269</b>	<b>24.69</b>	<b>50.76</b>	<b>149.29</b>
<b>Total Sheltered - all tenures</b>	<b>2,064</b>	<b>40.16</b>	<b>82.56</b>	<b>242.82</b>
Registered Care places offering personal care	942	18.32	37.68	110.82
Registered Care places offering nursing care	1,164	22.65	46.56	136.94

(Source: Contact Consulting from EAC database)

8.11 Places in Registered Care Homes offering personal care per thousand in the New Forest District are 30% below the average level of provision for England. This may be seen as a positive advantage in that this style of provision is being superseded to some extent by new forms such as Extra Care Housing but if this is the intention of policy it adds to the deficit in provision in specialist housing already identified.

8.12 In Registered Care Homes offering nursing care the ratio of places to population is slightly above the average for England

8.13 The intention of the County Council is to place greater reliance upon housing based forms, principally of Extra Care Housing, but the current levels of provision in all style of specialised accommodation and the disparity in the options available to home owners and social renters suggests that there is considerable scope for the development of a range of housing and care options in all tenures.

8.14 Table Fifteen provides the reference ratios for England drawn from the Elderly Accommodation Database, the source used by the Department for Communities and Local Government and the Department of Health .

**Table Fifteen Provision of places for older people in England**

Categories of provision	Number	Ratio of provision per 1,000 persons 75 years of age and over
Sheltered housing for rent	351,935	80.4
Retirement Housing for leasehold sale	111,074	25.37
All Sheltered / Retirement Housing	463,009	105.77
Extra Care Housing for Rent	43,293	9.89
Extra Care Housing for leasehold sale	12,004	2.74
All Extra Care Housing	55,297	12.63
Registered Care Home beds offering Personal Care	200,769	45.86
Registered Care Home beds offering Nursing Care	196,988	45.00

(Source: EAC Database, Re-formatted by Contact Consulting))

8.15 Annex Two sets out the details of the sheltered housing schemes and Registered Care Homes identified within New Forest District.

8.16 The overall picture is a mixed one: lower than average provision of social rented sheltered housing and of registered care offering personal care; higher than average provision of registered care providing nursing care and of leasehold retirement housing. Although the level of provision for leasehold retirement housing is much higher than the national average it still falls short of the levels needed to provide equity of access to appropriate housing in older age between tenures.

## **Key Points**

- The overall level of supply of specialised accommodation for older people in New Forest District conceals a huge inequality between people of different tenures.
- For those older people who are owner occupiers the ratio of provision for retirement housing for sale per thousand is 59.97.
- For those older people who are renters the comparable ratio per thousand is 207.03.
- Expressed in this way, as a standardised ratio, it is clear that older home owners in New Forest District are enormously disadvantaged in securing the specialised accommodation they need.
- Whilst the primary responsibility for addressing this deficit lies with New Forest District Council as the Housing Authority their response depends upon the application of planning policies by the New Forest National Park Authority within those parts of the district for his it acts as the LPA.

## **9 The future pattern of provision to which this development contributes**

9.1 The current pattern of provision in the New Forest, as in the rest of the country, was developed not in response to assessed need but rather in response to short-term demand and provider perceptions of what will be popular and fundable.

9.2 Moving to a pattern with a more rational base that seeks to place individual elements of provision within a wider context inevitably appears threatening to some. In seeking to look forward and to encourage a shift from the current pattern to one which offers a range of options to older people and is reflective of key characteristics of the older population it will be important to take into account a number of factors:

- The demand for rented conventional sheltered housing is likely to decline, as has been acknowledged and compensated for in local strategies.
- The suitability of the older stock for letting will become increasingly problematic.
- The potential for leasehold retirement housing will continue to grow.
- Some existing schemes will lend themselves to refurbishment and remodelling to provide enhanced sheltered housing to supporting rising levels of frailty.
- Some of this enhanced sheltered housing could be offered for sale alongside that for rent.
- Extra Care housing should be provided for sale and rent.
- There is a need for housing-based models of accommodation and care for people with dementia.
- Provision of Registered Care both for Personal and Nursing Care will need to be distributed so that it is more nearly matched to need within local populations.
- The challenges of maintaining viability in smaller Registered Care Homes will continue to drive change in provision with an increase in larger, purpose-built developments.
- Housing-based models for dementia care will provide an alternative to nursing home based strategies for meeting the needs of those living with moderate to severe dementia<sup>18</sup>

9.3 In the publication “Housing in Later Life”<sup>19</sup> we have updated the guidance that we originally prepared for the publication “More Choice Greater Voice” for the Department for Communities and Local Government and the Care Services

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<sup>18</sup> More Choice, Greater Voice, a toolkit for producing a strategy for accommodation with care for older people, Nigel Appleton, CLG & CSIP, 2008

<sup>19</sup> Housing in later life – planning ahead for specialist housing for older people, December 2012, National Housing Federation and the Housing Learning and Improvement Network.



Partnership (CSIP) at the Department of Health. That model assumed that a “norm” for conventional sheltered housing to rent would be around 50 units per 1,000 of the population over 75 years of age and around 75 units per 1,000 of leasehold retirement housing. This deliberately inverted the current levels of provision in most places but in doing so sought to reflect the rapidly changing tenure balance.

9.4 Although we believe the stock of rented sheltered housing will continue to decline as the older stock becomes increasingly hard to let, the rate of its reduction may be rather slower than predicted as a consequence of the scarcity of capital funding to carry out re-provision. The same factors will inhibit the development of the general rented stock and the desire to release under-occupied housing by transfer into sheltered housing will have a greater priority, sustaining demand for the rented sheltered stock.

9.5 After a period of uncertainty in the middle of the last decade, demand for leasehold retirement housing has grown more strongly and we would therefore revise upward our targets for leasehold retirement housing, especially in areas where owner-occupation levels among older people are high and property values facilitate the move to such accommodation.

9.6 When we framed our targets in late 2007/ early 2008 Extra Care Housing was still little known, in many areas there were no developments at all and the initial targets reflected the difficulty of bringing forward developments on a model that was unfamiliar to many professionals and virtually unknown to the general public. The Department of Health and Homes and Communities Agency capital investment programmes have accelerated the rate of Extra Care Housing developments and the increasing number of commercially developed retirement Villages and Continuing Care Retirement Communities, especially across the South of England have made the concept much better known.

9.7 The targets offered for Extra Care provision in the 2008 publication were very much a “toe in the water” at a time when it was still difficult to judge the acceptability of the model to older people or to those who advised them. That situation has now changed and we would propose not only an increased target overall but a shift in the tenure balance to reflect the increasing recognition of the needs of older home owners for Extra Care style options.

9.8 The continuing drive among Adult Social Care authorities to shift from policies that rely heavily on Registered Care homes toward Extra Care Housing solutions also shifts the balance and supports an increase in targets either side of this divide.

9.9 When analysed in relation to the proportion of older people in the borough who are owner-occupiers there is a marked under-supply of retirement housing offered on a leasehold basis. The Council has a role in encouraging the

identification of sites, in influencing the style of provision and through the Local Development planning process to facilitate an increase in this provision.

9.10 It is widely recognised that a proportion of the conventional sheltered housing stock for rent does not meet current standards for space and facilities. Some of the stock will find other uses but some will need to be de-commissioned. New Forest District Council has already moved strongly in that direction which is reflected in the current levels of supply.

9.11 Some conventional sheltered schemes may lend themselves to enhancement through additional services and facilities so that they provide a suitable environment for frailer older people. We suggest that around five hundred units of enhanced sheltered housing may be needed across the district. This represents a ratio of around 20 places per 1,000 people over 75, divided equally between ownership and renting. The addition of service and facilities, together with work to ensure high standards of accessibility in individual dwellings and in common parts will provide a future use for some of those sheltered units for rent that might otherwise prove increasingly difficult to let.

9.12 Some stock may be suitable to move in the opposite direction. There is a recognised and increasing need for small manageable accommodation for single person households in late middle age or very early old age. Some of these people will have a range of other needs or vulnerabilities. Being accommodated in conventional sheltered housing with people of more advanced years is not suitable for either party. Some current sheltered blocks might be re-modelled to accommodate this category of need with communal facilities more suitable to the age group, a concierge service in place of a sheltered housing manager and access to appropriate support and care workers.

9.13 Extra Care Housing offers the possibility of housing a balanced community of people with relatively limited care needs through to those who might otherwise be living in residential care. Our modelling suggests provision of around one thousand one hundred and twenty-five units of Extra Care in total, divided between rented (about one third) and leasehold and shared ownership tenures (about two thirds) will be required in the short to medium term.

9.14 Within the model a modest provision is made for the development of housing forms to provide a context for the care of those people with dementia who cannot be supported in their existing home but require an alternative to residential or nursing home care, the norm here is 6 places per 1,000.

9.15 Table Sixteen summarises the current levels of provision and the adjustments that may be indicated to bring them to the levels that some would see as a benchmark for the future. How much specialised accommodation may be needed in total? Previous estimates of the requirements for sheltered housing

tended to look mainly at the need for social rented provision, rather than at the overall potential demand.

9.16 The emergence of owner-occupation as a significant factor in old age has shifted the balance between estimates of need and response to demand. The benefits of providing more leasehold retirement housing, for example, may be as much in its effect in releasing family sized accommodation into the market as in meeting the particular needs of those who move into it.

9.19 The “norms” are inevitably arbitrary and may be moderated to take account of the rate of change that would be required to meet them. In some cases they may produce perverse results, as in this case, indicating a need to increase the provision of rented sheltered housing when deliberate local action has reduced the level of provision. Likewise the very substantial potential increase in leasehold retirement housing to achieve parity between tenures will take a considerable time to achieve but does indicate the scale of provision that will be required to achieve equity of access across tenures.

**Table Sixteen      Projection of future accommodation requirements for older people – New Forest DC**

		Current provision	Current provision per 1,000 of the population 75+	Increase or decrease	Resulting number of units	Projected provision per 1,00 of the population 75+ (25,000)
Conventional sheltered housing to rent		611	24.11	+889	1,500	60
Leasehold retirement housing		1,227	49.09	+1,773	3,000	120
Enhanced sheltered/retirement housing	For rent	14	0.56	+236	250	10
	For sale	0	0	+250	250	10
Extra Care Housing	For rent	170	6.80	+205	375	15
	For sale	42	1.68	+708	750	30
Housing based provision for dementia		0	0	+150	150	6

## **Key Points**

- The growth homeownership among older people, and their desire to maintain their tenure of choice as they move into retirement housing is driving need and demand for specialised accommodation available in this tenure. There is a clear need for the provision of both Extra Care Housing and for this provision to be matched by retirement accommodation for independent living.
- The most pressing priority, driven by demography, need, tenure, policy imperatives and issues of equality is to increase the availability of all forms of specialised accommodation for older homeowners. The development proposed for Lyndhurst High Street makes a modest contribution to meeting that priority.

## **Annex One      Explanation of terms used in this report**

This report uses terms which are commonly understood among those working in the field of housing and care for older people but may not be so readily comprehensible by those working in other disciplines. Whilst not exhaustive this section seeks to explain the meaning and usage on this document, of some of those terms:

**Sheltered housing** is a form of housing intended for older people that first emerged in the 1950s and was developed in volume through the 1960s and 1970s. In this period it was developed in one of two styles: “Category Two” Sheltered Housing consisted of flats and/or bungalows with enclosed access, a communal lounge and some other limited communal facilities such as a shared laundry and a guest room. Support was provided by one or more “wardens” who were normally resident on site. “Category One” Sheltered Housing has many of the same features but might not have enclosed access, might have more limited communal facilities and would not normally have a resident warden. In current practice these models have merged and the service models for delivery of support are in flux. This provision has generally been made by Housing Associations and Local Authorities.

**Retirement Housing** is a term widely adopted to describe Sheltered Housing, similar in built form and service pattern to Category Two Sheltered Housing described above but offered for sale, generally on a long lease, typically ninety-nine or one hundred and twenty-five years. This provision has generally been made both by Housing Associations (often through specialist subsidiaries) and commercial organisations.

**Very sheltered housing** is a term now largely disappearing from use that was used first in the mid to late 1980s to describe sheltered schemes that sought to offer some access to care services and some additional social and care facilities.

**Enhanced sheltered housing** is the term that has largely succeeded to Very Sheltered Housing to describe sheltered housing that provides more in facilities and services than traditional sheltered housing but does not offer the full range of facilities, services and activities to be found in an Extra Care Housing Scheme.

**Extra Care Housing** is the term used for a complex of specialised housing for older people that provides a range of “lifestyle” facilities for social, cultural, educational and recreational activities, in addition to services that provide care in a style that can respond flexibly to increasing need whilst helping the individual to retain their place within their existing community. In most Extra Care Housing schemes people enter their unit of accommodation and the care services they receive are delivered into that unit as their needs increase. This is generally referred to as the “integrated model” of Extra Care.

**Continuing Care Retirement Community** is a variant of the Extra Care Housing model but one in which higher levels of care are generally delivered by transfer within the scheme from an independent living unit in which low to moderate care is delivered into a specialist unit or care home. This pattern is often referred to as the “campus” model of Extra Care.

**Registered Care Home** is the form of institutional provision that in the past would have been referred to as either a “Residential Care Home” or a “Nursing Home”. All are now referred to as “Registered Care Homes” and differentiated as either “Registered Care Home providing personal care” or as a “Registered Care Home providing nursing care”.

## Annex Two: Specialist Accommodation for Older People in New Forest

### Age exclusive housing to rent

Name of scheme	Address	Manager	Number of units
<b>Bannister Court</b>	Rumbridge Gardens, Totton, Hampshire SO40 9PL	New Forest District Council	38 (F)
<b>Boulton Cottages</b>	Emery Down, Lyndhurst, Hampshire, SO43 7DY	Emery Down Cottages Trust	5 (F)
<b>Brook Corner</b>	Brook Hill, Bramshaw, Hampshire SO43 7JB	Sovereign Housing Association Ltd	8 (B)
<b>Campion House</b>	Campion Way, Lymington, Hampshire SO41 9LG	New Forest District Council	15 (F)
<b>Clover Court</b>	Ashley, New Milton, Hampshire BH25 5XX	New Forest District Council	21 (B & C)
<b>Evergreens</b>	Rose Road, Totton, Hampshire SO40 9JP	New Forest District Council	17 (F)
<b>Ewart Court</b>	Jones Lane, Hythe, Hampshire SO45 6DG	New Forest District Council	28 (F)
<b>Hall House</b>	Hale Road, Woodgreen, Fordingbridge, Hampshire SP6 2AJ	Stonewater	8 (F)
<b>Homeleigh Court</b>	New Milton, Hampshire BH25 6AD	Places for People Homes	16 (F)
<b>Howard Oliver House</b>	Hobart Drive, Hythe, Hampshire SO45 6EZ	New Forest District Council	49 (F & B)

<b>Mopley Close</b>	Blackfield, Hampshire SO45 1YL	Places for People Homes	18 (B)
<b>Quadrant Almshouses</b>	Church Street, Fordingbridge, Hants SP6 1AS	The Quadrant Almshouses Charity	8 (F)
<b>Regency Place</b>	Ringwood, Hampshire BH24 1NA	Places for People Homes	26 (B)
<b>Solent Mead</b>	Church Lane, Lymington, Hampshire, SO41 3RA	New Forest District Council	15 (F)
<b>Total</b>			<b>272</b>

#### **Sheltered housing to rent**

Name of scheme	Address	Manager	Number of units
<b>Charles Ley Court</b>	Denny Close, Fawley, Hampshire SO45 1FR	Housing & Care 21	31 (F)
<b>Green Lane House</b>	17 Green Lane, Fordingbridge, Hampshire SP6 1HT	Abbeyfield Wessex Society Ltd	10 (F)
<b>Hanover Court</b>	Carpenter Close, Hythe, Southampton, Hampshire SO45 6GR	Hanover	24 (F)
<b>Muir House</b>	Beaulieu Road, Dibden Purlieu, Southampton, Hampshire SO45 4NY	Muircroft Housing Association	57 (F)
<b>Parklands</b>	Stannington Way, Totton, Southampton SO40 3QT	Sovereign Housing Association Ltd	30 (F)
<b>Pearce Smith Court</b>	Marine Drive, Barton- on-Sea, New Milton, Hampshire BH25 7EE	Housing & Care 21	32 (F)
<b>Pembridge House</b>	Salisbury Road, Fordingbridge,	Sovereign Housing	24 (F)



	Hampshire SP6 1QT	Association Ltd	
<b>Priest Croft</b>	Priest Croft Drive, Blackfield, Southampton, Hampshire SO45 1SL	Muircroft Housing Association	49 (F)
<b>St Denys</b>	Station Road, New Milton, Hampshire BH25 6LR	Sovereign Housing Association Ltd	38 (F)
<b>Westmoreland Court</b>	Stopples Lane, Hordle, Lymington, Hampshire SO41 0YA	Anchor	44 (F)
<b>Total</b>			<b>339</b>

#### **Enhanced Sheltered housing to rent**

Name of scheme	Address	Manager	Number of units
<b>The Shelbourne at Sway Support Cottages</b>	Church Lane, Sway, Lymington, Hampshire SO41 6AD	Gracewell Healthcare	14 (C)
<b>Total</b>			<b>14</b>

#### **Extra Care to rent**

Name of scheme	Address	Manager	Number of units
<b>Barfields Court</b>	Emsworth Road, Lymington, Hampshire SO41 9GN	New Forest District Council	39 (F)
<b>Gore Grange</b>	Jowitt Drive, Gore Road, New Milton, Hampshire BH25 6SB	New Forest District Council	37 (F)
<b>Quaker Court</b>	Eynon Mews, Ringwood, Hampshire, BH24 1EW	Sovereign Housing Association	36 (F)
<b>Riverside Court</b>	West Street, Fordingbridge, Hampshire SP6 1GH	Sovereign Housing Association	25 (F)

<b>Winfred House</b>	Boniface Close, Totton, Hampshire SO40 3SJ	New Forest District Council	33 (F & B)
<b>Total</b>			<b>170</b>

#### **Age exclusive housing for sale**

Name of scheme	Address	Manager	Number of units
<b>Bucklers Mews</b>	Anchorage Way, Stanford Hill, Lymington, Hampshire SO41 8JL	First Port	14 (B) Leasehold
<b>Casselles Court</b>	New Milton, Hampshire BH25 6DX	First Port	12 (F) Leasehold
<b>Millstream Court &amp; Lynes Court</b>	White Lion Courtyard, Deweys Lane, Ringwood, Hampshire BH24 1AJ	White Lion Courtyard Retirement Homes (Ringwood) Ltd	20 (F) Leasehold
<b>Pyrford Gardens</b>	67 Belmore Lane, Lymington, Hampshire SO41 3NR	Peter Hall Ltd	24 (F & B) Leasehold
<b>Total</b>			<b>70</b>

### Sheltered housing for sale

Name of scheme	Address	Manager	Number of units
<b>Andrews Lodge</b>	66-66A Southampton Road, Lymington, Hampshire SO41 9AX	Millstream Management Services	35 (F) Leasehold
<b>Androse Gardens</b>	Blickesley Road, Ringwood, Hampshire BH24 1EG	Retirement Lease Housing Association	37 (F) Leasehold
<b>Bucklers Court</b>	Anchorage Way, Stanford Hill, Lymington, Hampshire SO41 8JN	FirstPort	39 (F & C) Leasehold
<b>Coppice Gate</b>	Beaulieu Road, Dibden Purlieu, Southampton, Hampshire, SO45 4PW	McCarthy & Stone	32 (F) Leasehold
<b>Cornmantle Court</b>	2 Parsonage Barn Lane, Ringwood, Hampshire, BH24 1WJ	McCarthy & Stone Management Services Ltd	33 (F) Leasehold
<b>Cottage Mews</b>	25-27 Christchurch Road, Ringwood, Hampshire BH24 1DG	First Port	26 (F) Leasehold
<b>Court Cottages</b>	Ridgeway Lane, Lymington, Hampshire SO41 8FQ	First Port	9 (C) Freehold
<b>Courtlands</b>	New Street, Lymington, Hampshire SO41 9BJ	Anchor	19 (F) Leasehold/ Shared Ownership
<b>Danestream House/Court</b>	Sea Road, Milford on Sea, Hampshire SO41 0DA.	First Port	39 (F) Leasehold
<b>Floriston Gardens</b>	Ashley Road, New Milton, Hampshire BH25 5DL	Hanover	28 (F) Leasehold
<b>Forest Edge</b>	Holland Road, West Totton, Southampton SO40 8JQ	First Port	24 (F) Leasehold

<b>Heathlands Court</b>	Beaulieu Road, Dibden Purlieu, Southampton, Hampshire SO45 4BB	First Port	26 (F) Leasehold
<b>Homeborough House</b>	Brinton Lane, Hythe, Hampshire SO45 6EE	First Port	42 (F) Leasehold
<b>Homebridge House</b>	Salisbury Road, Fordingbridge, Hampshire SP6 1JJ	First Port	40 (F) Leasehold
<b>Homefield House</b>	Barton Court Road, New Milton, Hampshire BH25 6NP	First Port	33 (F) Leasehold
<b>Homeforde House</b>	Grigg Lane, Brockenhurst, Hampshire SO42 7QX.	First Port	51 (F) Leasehold
<b>Homegrange House</b>	Shingle Bank Drive, Milford on Sea, Lymington, Hampshire SO41 0WR	Millstream Management Services	37 (F & C) Leasehold
<b>Homemill House</b>	Station Road, New Milton, Hampshire BH25 6HX	First Port	49 (F) Leasehold
<b>Homewood House</b>	Milford Road, Pennington, Lymington, Hampshire SO41 8EZ	First Port	47 (F) Leasehold
<b>King Edgar Lodge</b>	Christchurch Road, Ringwood, Hampshire, BH24 1DH.	Churchill Retirement Living	25 (F) Leasehold
<b>Kings Court</b>	Salisbury Street, Fordingbridge, Hampshire SP6 1AB	First Port	43 (F) Leasehold
<b>Lakeside Pines</b>	Barrs Avenue, New Milton, Hampshire BH25 5GQ	Hanover	41 (F) Leasehold
<b>Langdown Firs</b>	Langdown Lawn, Hythe, Southampton SO45 5BT	Napier Management Services	34 (F) Leasehold/ Shared Ownership
<b>Latchmoor Court</b>	Latchmoor, Brockenhurst, Hampshire SO42	First Port	25 (F & B) Leasehold

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<b>Monmouth Court</b>	Church Lane, Lymington, Hampshire SO41 3RB	First Port	26 (F & B) Leasehold
<b>North Close</b>	Lymington, Hampshire, SO41 9BU	Churchill Retirement	41 (F)
<b>Parish Court</b>	Emsworth Road, Lymington, Hampshire SO41 9BS	Sullivan Lawford	33 (F) Leasehold
<b>Popes Court</b>	Popes Lane, Totton, Southampton, Hampshire SO40 3GF	First Port	49 (F) Leasehold
<b>Rufus Court</b>	Gosport Lane, Lyndhurst, Hampshire SO43 7ER	First Port	46 (F, B & C) Leasehold
<b>Springdale Court</b>	16 Water Lane, Totton, Southampton, Hants SO40 3DP	First Port	33 (F & B) Leasehold
<b>The Boltons</b>	Gosport Lane, Lyndhurst, Hampshire, SO23 7BF	Hanover	26 (F) Leasehold
<b>Timbermill Court</b>	Church Street, Fordingbridge, Hampshire SP6 1RG	Cognatum Property	18 (F & C) Leasehold
<b>Waverley House</b>	Waverley Road, New Milton, Hampshire BH25 6PQ	First Port	34 (F) Leasehold
<b>Wellington Court</b>	Fernhill Lane, New Milton, Hampshire BH25 5ST	Grange	37 (F, B & C) Leasehold
<b>Total</b>			<b>1,157</b>

#### Enhanced Sheltered housing for sale

Name of scheme	Address	Manager	Number of units
<b>Total</b>			<b>0</b>

**Extra Care for sale**

Name of scheme	Address	Manager	Number of units
<b>Farringford Court</b>	1 Avenue Road, Lymington, Hampshire SO41 3PA	YourLife Management Services Ltd	42 (F) Leasehold
<b>Total</b>			<b>42</b>

**Registered care homes providing personal care**

Name of scheme	Address	Owner	Number of beds
<b>Ashlett Dale Rest Home</b>	Stonehills, Fawley, Hampshire SO45 1DU	Mr F W & Mrs M M Liddington	16
<b>Ashley Arnewood Manor</b>	32 Ashley Road, New Milton, Hampshire BH25 6BB	Mr & Mrs Scott	20
<b>Avondale Lodge Care Home</b>	Hythe Road, Marchwood, Southampton, Hampshire SO40 4WT	Mr E R & Mrs P A Nkomo	14
<b>Badgers Holt</b>	Butts Ash Lane, Hythe, Hampshire SO45 3QY	Mrs T Rayner	25
<b>Barton Lodge Residential Retirement Care</b>	Barton Common Road, Barton-on-Sea, New Milton, Hampshire BH25 5PR	Manucourt Limited	39
<b>Beach Crest</b>	40 Marine Drive East, Barton-on-Sea, New Milton, Hampshire BH25 7DX	Dr V & Mrs S V Faldu	8
<b>Bethel House</b>	28 Beach Avenue, Barton-on-Sea, Hampshire BH25 7EJ.	Hartford Care	31
<b>Carlton House Rest Home</b>	15 Barton Court Road, New Milton, Hampshire BH25 6NN	Mr Ian Herridge	33
<b>Chestnut Court Rest Home</b>	9 Copse Road, New Milton, Hampshire BH25 6ES	Beritaz Care	25
<b>Cranleigh Paddock Older Persons Resource Centre</b>	Calpe Avenue, Lyndhurst, Hampshire SO43 7AT	Hampshire County Council	32

<b>Elingfield House</b>	26 High Street, Totton, Southampton, Hampshire SO40 9HN	Mrs S M Hollingworth	14
<b>Engleburn</b>	Milford Road, Barton- on-Sea, New Milton, Hampshire BH25 5PN	Mrs M Grey	76
<b>Farmhouse Care Home</b>	87 Water Lane, Totton, Southampton, Hampshire SO40 3DJ	Richard Kitchen Care	20
<b>Forest Edge Rest Home</b>	Southampton Road, Cadnam, Southampton, Hampshire SO40 2NF	Mr T T Brown	32
<b>Freegrove</b>	60 Milford Road, Pennington, Lymington, Hampshire SO41 8DU	Mrs H Goodfellow	17
<b>Glynn Court</b>	Fryern Court Road, Tinkers Court Road, Fordingbridge, Hampshire SP6 1NG	Mrs S Crook	31
<b>Gracewell of Sway</b>	Sway Place, Church Lane, Sway, Lymington, Hampshire SO41 6AD	Gracewell Healthcare	68
<b>Grey Gables</b>	29 Kennard Road, New Milton, Hampshire BH25 5JR	Mr Duke Minks	24
<b>Hillyfield Rest Home</b>	Barnes Lane, Milford- on-Sea, Hampshire SO41 0RP	Mr David C & Mrs A M Harmer	16
<b>Linden House</b>	New Street, Lymington, Hampshire SO41 9BP	Hampshire County Council	34
<b>Moorland House</b>	20 Barton Court Avenue, New Milton, Hampshire BH25 7HF	Mr & Mrs Spencer	20



<b>Oak Mount Rest Home</b>	2 Narrow Lane, Poulner, Ringwood, Hampshire BH24 3EN	Oak Mount Care Home Ltd	21
<b>Oak Tree Lodge</b>	114 Lyndhurst Road, Ashurst, Southampton, Hampshire SO40 7AU	Ms Gillian A Kerr	18
<b>Oaklands Rest Home</b>	Veals Lane, Marchwood, Southampton, Hampshire SO40 4WW	Mrs Patricia F Leaver	17
<b>Osborne Lodge</b>	30 Osborne Road, New Milton, Hampshire BH25 6AD	P R Hockings	24
<b>Quaker House</b>	40-44 Barton Court Road, New Milton, Hampshire BH25 6NR	New Milton Quaker Housing Association	40
<b>Solent Mead</b>	Church Lane, Lymington, Hampshire SO41 3RA	Hampshire County Council	36
<b>St Elmo Care Home</b>	Gorley Road, Poulner, Ringwood, Hampshire BH24 1TH	Quality Care Group	23
<b>Sundial Cottage</b>	Badminton Drove, Fawley, Hampshire SO45 1BW	N Sykes & L Beale	22
<b>Tendring Care Home</b>	Ringwood Road, Netley Marsh, Southampton, Hampshire SO40 7DY	Quality Care Group	23
<b>The Dome Hotel</b>	121 Barton Court Avenue, Barton-on- Sea, Hampshire BH25 7EY	Mrs G Lawrence	3
<b>The Gatehouse</b>	64 Becton Lane, Barton-on-Sea, Hampshire BH25	Mr E & Mrs J I Breckon	21

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<b>Thornfield Care Home</b>	8 Milford Road, Pennington Cross, Lymington, Hampshire SO41 8DJ	Mr & Mrs Sweeten	17
<b>Whitegates Care Home</b>	Gravel Lane, Ringwood, Hampshire BH24 1LL	Mr & Mrs Traies	21
<b>Woodlands House</b>	205 Woodlands Road, Woodlands, Southampton, Hampshire SO40 7GL	Hartford Care	40
<b>Woodside Lodge</b>	160 Burley Road, Bransgore, Christchurch, Hampshire BH23 8DB	Mrs M R Steele	21
<b>Total</b>			<b>942</b>

#### Registered care homes providing nursing care

Name of scheme	Address	Owner	Number of beds
<b>Allenbrook Nursing Home</b>	34 Station Road, Fordingbridge, Hampshire SP6 1JW	Affinity Care Management	40
<b>Ashley Lodge Residential and Nursing Home</b>	Golden Hill, Ashley Lane, Ashley, New Milton, Hampshire BH25 5AH	BUPA Care Homes	77
<b>Belmore Lodge</b>	Milford Road, Lymington, Hampshire SO41 8DJ	Colten Care Ltd	55
<b>Bickerley Green</b>	Kingsbury Lane, Ringwood, Hampshire BH24 1EL	Hampshire County Council	60
<b>Birchy Hill Care Home</b>	Birch Hill, Sway, Lymington, Hampshire SO41 6BJ	Angel Care & MNS Care plc	65

<b>Colbury House Nursing &amp; Residential Home</b>	Hill Street, Calmore, Totton, Southampton, Hampshire SO40 2RX	Godavari Healthcare	58
<b>Court Lodge Nursing &amp; Residential Home</b>	Court Close, Ridgeway Lane, Lymington, Hampshire SO41 8NQ	Colten Care Ltd	40
<b>Fordingbridge Care Home</b>	Station Road, Fordingbridge, Hampshire SP6 1JP	Sentinel Health Care	60
<b>Forest Court</b>	Forest Way, Tatchbury Mount, Calmore, Southampton SO40 2PZ	Hampshire County Council	80
<b>Forest Oaks</b>	The Rise, Brockenhurst, Hampshire SO42 7SJ	Wilverley Association	45
<b>Gorselands Nursing Home</b>	Coach Hill Lane, Burley Street, Ringwood, Hampshire BH24 4HN	Gorselands in the Forest Ltd	39
<b>Hartwood House</b>	Bournemouth Road, Lyndhurst, Hampshire SO43 7DP	Cinnamon Care Collection	50
<b>Kingfishers</b>	The Meadows, New Milton, Hampshire BH25 7JB	Colten Care Ltd	60
<b>Laurel Bank Care Home</b>	Salisbury Road, Calmore, Southampton, Hampshire SO40 2RW	Laurel Care Home Ltd	57
<b>Linden House</b>	New Street, Lymington, Hampshire SO41 9BP	Colten Care Ltd	60
<b>Little Haven</b>	Beaulieu Road, Dibden Purlieu, Southampton, Hampshire SO45 4JF	Wilverley Association	41

<b>New Forest Nursing Home</b>	Fritham House, Fritham, Lyndhurst, Hampshire SO43 7HH	Sentinel Health Care	48
<b>Ocean Breeze</b>	22 Barton Wood Road, Barton-on-Sea, Hampshire BH25 7NN	Cordline Ltd	22
<b>St George's Nursing Home</b>	De La Warr Road, Milford-on-Sea, Hampshire SO41 0PS	St George's Hospital Ltd	39
<b>The Birches Nursing Home</b>	239 Water Lane, Totton, Southampton, Hampshire SO40 3GE	Messrs Paul & Peter Harrison	21
<b>West Cliff Hall</b>	West Street, Hythe, Hampshire SO45 6AA	Hartdford Care	59
<b>White Rock Nursing Home</b>	15 Chestnut Avenue, Barton-on-Sea, New Milton, Hampshire BH25 7BQ	Mrs Siobhan M Dodd	30
<b>Windy Ridge Care Home</b>	32 Barton Lane, Barton-on-Sea, New Milton, Hampshire BH25 7PN	Angel Care & MNS Care plc	21
<b>Woodpeckers Nursing &amp; Residential Home</b>	Sway Road, Brockenhurst, Hampshire SO42 7RX	Colten Care Ltd	37
<b>Total</b>			<b>1,164`</b>

### **Annex Three: The author of this report:**

#### **Nigel J W Appleton MA (Cantab)**

Nigel Appleton is Executive Chairman of Contact Consulting (Oxford) Ltd, a consultancy and research practice specialising in issues of health, housing and social care as they affect older people and people with particular needs. Nigel's area of interest and expertise is in relation to the accommodation and care needs of older people.

Nigel Appleton has a nationally established reputation in the field of estimating the requirement for particular styles of accommodation for older people, having been the author of publications supported by the Department of Communities and Local Government and the Department of Health that provide guidance in this area.<sup>20</sup>

In recent years he has developed a substantial practice in the demonstration of need for older people's accommodation and the documentation of that need to form part of a planning case. His work has also been tested at Appeal where he has contributed to the applicant's case as an Expert Witness. Nigel contributed to three appeals for three different clients between December 2014 and November 2016 all were allowed.

He contributed the section "Preparing the Evidence Base" to "Housing in later life – planning ahead for specialist housing for older people" (National Housing federation and the Housing LIN, December 2012). This updated the comparable sections of his: "More Choice: Greater Voice – a toolkit for producing a strategy for accommodation with care for older people" (February 2008 for Communities and Local Government and the Care Services Improvement Partnership). He is also the author of "Connecting Housing to the Health and Social Care Agenda – a person centred approach" (September 2007 for CSIP).

Nigel also wrote "Planning for the Needs of the Majority – the needs and aspirations of older people in general housing" and "Ready Steady, but not quite go – older homeowners and equity release", both for the Joseph Rowntree Foundation.

For the Change Agent Team at the Department of Health he wrote "An introduction to Extracare housing for commissioners" and "Achieving Success in Developing Extra Care housing" together with a number of briefing papers and studies in the area of sheltered housing and its variants.

Other publications include three Board Assurance Prompts on the deployment of Assistive Technology/ telecare in both specialised and general housing for older people; "Housing and housing support in mental health and learning disabilities – its

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<sup>20</sup> "More Choice, Greater Voice, a toolkit for producing a strategy for accommodation with care for older people", Nigel Appleton, CLG & CSIP, 2008 & "Housing in later life – planning ahead for specialist housing for older people", December 2012, National Housing Federation and the Housing Learning and Improvement Network.

role in QIPP”, National Mental Health Development Unit, with Steve Appleton (2011) and “The impact of Choice Based Lettings on the access of vulnerable adults to social housing” (2009) for the Housing LIN at the Department of Health.

Nigel led the team that prepared the material for the Good Practice Guidance for local authorities on delivering adaptations to housing for people with disabilities issued by the Office of the Deputy Prime Minister, Department of Health & Department for Education and Skills.

His expertise covers the full spectrum of issues in the field of housing and social care for older people. He has supported more than thirty local authorities in preparing their strategies for accommodation and care in response to the needs of an ageing population. With his team he has conducted a number of detailed reviews of existing sheltered housing schemes for both local authority and not for profit providers.

Nigel also brings expertise in relation to the various models of accommodation for older people and the operational issues that may arise in relation to staffing numbers and profile, operational viability and related matters.<sup>21</sup>

He has worked with housing and adult social care officers and members in a wider range of local authorities, and with various commissioning and provider bodies within the NHS. Nigel works to support development, operation and evaluation of specialised accommodation for providers in statutory, commercial and third sectors.

Nigel served as Expert Advisor to the Social Justice and Regeneration Committee of the Welsh Assembly in its review of housing and care policies in relation to older people in Wales.

Prior to establishing his consultancy in 1995 Nigel was Director of Anchor Housing Trust. He is a trustee of Help and Care, Bournemouth, a Governor and Chair of the Management Committee of Westminster College, Cambridge. Nigel formerly served as Vice Chair of the Centre for Policy on Ageing and has been an honorary research fellow at the Centre for Urban and Regional Studies, Birmingham University. In the more distant past he was a member of the Governing Body of Age Concern England and a Board Member of Fold Housing Group, Northern Ireland.

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<sup>21</sup> For example, for the Joseph Rowntree Foundation: “Planning for the Needs of the Majority – the needs and aspirations of older people in general housing”, and for the Change Agent Team at the Department of Health: “An introduction to Extracare housing for commissioners” and “Achieving Success in Developing Extra Care housing”

## **APPENDIX 5**

### **TOURISM IMPACT REPORT**

# **Tourism Impact Review**

## **The Former Lyndhurst Hotel Lyndhurst Hampshire**

**Prepared on behalf of:**

**PegasusLife**

**by Chris Morton**

**May 2016**



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## 1: Introduction

- 1.1 PegasusLife commissioned Chris Morton Associates Ltd to review the impact of the loss of the Lyndhurst Hotel on the local tourism market.
- 1.2 To undertake this review we have reviewed tourism data that is in the public domain, including: data published by Visit England and the latest 'The Economic Impact of Tourism, New Forest, 2014' prepared by Tourism South East. We have further contacted Tourism South East to secure a copy of their tourism operator database to better understand the supply side data used in the model and reviewed published reports from Hotel Analyst and PriceWaterhouseCoopers amongst others.
- 1.3 A copy of a report on the former hotel's viability following a programme of refurbishment, commissioned by PegasusLife in 2015, has also been reviewed. A copy of a property condition report prepared by Simpson Hilder Associates has also been provided. We have not included copies of photographs and a general description of the property contained in that report to save duplication.
- 1.4 In addition to the above we have undertaken substantial research to confirm the general accuracy of the supply side database and to identify the nature and trends in the local tourism industry.
- 1.5 The following report includes a summary of the information gathered during the above programme of research and our findings.

## 2: Lyndhurst Park Hotel – History

1. The property appears to have started life as a residence owned by a Mr Castleman. In circa 1897 it was turned into a hotel, called The Grand, a name it retained until the building was sold to Robin Cousins in 1970. Mr Cousins renamed it the Lyndhurst Park Hotel. Mr Cousins acquired several hotels over a period of several years and branded the group as Forestdale Hotels in 1978.
2. In 2010 Forestdale Hotels remained a privately owned group and included 18 3 star properties spread across England. In December of that year the group was acquired by Akkeron Hotels, a company formed the previous year to acquire the 8 strong Folio Hotel group out of administration. Forestdale Hotels Ltd was reported to be struggling both financially and to maintain the standard of its hotels, no doubt in part due to the economic downturn of 2007/08.
3. In March 2014 Forestdale Hotels, then a subsidiary of Akkeron, was placed into administration once again. In the same month 14 of their properties, including the Lyndhurst Park Hotel, were acquired by St James's Hotels.
4. Eight of the 14 hotels acquired by St James's Hotels are still traded by that company, though Pratts Hotel in Bath is currently closed for refurbishment. Six were disposed of, one way or another, as shown in the table below.

Former Forestdale Hotel Properties Disposed of by St James's Hotels		
Hotel	Location	Situation
Burley Manor	Ringwood	Bought by New Forest Hotels Ltd
Southampton Park Hotel	Southampton	Bought by Premier Inn
Wessex Hotel	Bournemouth	Acquired by private investor
Roebuck Hotel	Ware	Closed early 2014
Ardsley House Hotel	Barnsley	Closed July 2014
Lyndhurst Park Hotel	Lyndhurst	Closed late 2014

Source: Caterer

5. In February 2015 the local press in Ware reported that new owners had obtained permission for the development of a care home on the site of the former Roebuck Hotel, then owned by St James's Hotels. During the earlier planning enquiry, Nicholas Crawley, a Director of St James's Hotels, was quoted as saying that Akkeron Hotels purchased the Roebuck as part of a group of 18 hotels in 2011 (the Forestdale Hotel purchase), and that around 20 per cent of them were "lame ducks". The Lyndhurst Park Hotel was not mentioned by name.
6. It is interesting to note that of the six hotels disposed of by St James's Hotels, only three have ceased trading. The other three have continued to trade with other new operators. There is an implication here that the three which have closed did not appeal to other operators.

7. The Lyndhurst Park Hotel viability report show the levels of revenue and profit achieved by the property in its final three years of trading as:

Lyndhurst Park Hotel Trading Summary 2012 to 2014		
Year	Revenue	Profit
	£	£
2012	1.228m	191k
2013	1.036m	35k
2014*	0.863m	-83

*Note to table: \* Not a full trading year.*

*Source: PegasusLife*

8. Details of average room rate and trading occupancy are not available, but, based on a full trading year of 365 days and 60 available guest rooms, the above results show that the average revenue per available room per night were £56.07 and £47.31 respectively in 2012 and 2013. Given that these figures include food and beverage revenues from residential lets and functions, as well as room revenue, the results are low.
9. The viability report also refers to low levels of customer satisfaction according to Tripadvisor.
10. The Property Condition Report by Simpson Hilder Associates in March 2015 describes an extremely tired building, which accords with the findings in the viability report. It also concludes that the hotel 'had come to the end of its functional and economic life by virtue of the changes in consumer requirements and the lack of investment made over the past 20 years.' The report concludes with the following comments:

*15.1 From our inspection of the premises we have generally found it to be in need of extensive refurbishment and external repair and it no longer presents well as compared to more upmarket country hotel offerings or budget offerings in the region.*

*15.2 The village hall ambience of the ballroom conferencing facility is not an attractive proposition for either social or institutional gatherings and only the principal staircase and the restaurant and breakfast room present appropriately to the country house hotel market.*

*15.3 All of the rooms require extensive refurbishment including new bathrooms, common areas require extensive refurbishment with remodelling to the entrance, reception and lounge areas and major works are required to the ballroom facility.*

*15.4 The services are dated with extensive surface mounted cabling a relatively unsophisticated fire safety system and a dated and a poorly controllable heating system.*

11. The report by Simpson Hilder Associates describes a distressed building suffering from many deficiencies, due to its construction in a least three phases, designs that are no longer fit for purpose and poor maintenance over time. The report creates the impression of owners who tried to keep pace with changing trends by adding new facilities that sadly were acceptable at the start of each trend but were overtaken by sophisticated improvements elsewhere. For example the gym is in a separate single storey construction at the rear whilst the swimming

pool is small and uncovered. The report further highlights that the hotel suffered from issues with accessibility, with some rooms and floors being unavailable to guests requiring lift access. The lift that is provided is exceedingly small for a property of this size and the lift shaft would be extremely difficult to enlarge. Further there appear to be floor level changes between the separate buildings resulting in ramps and steps to enable guest access. Several of the bedrooms do not have en-suite facilities and many that do, are shown to be small single or cramped double rooms. The bathrooms in many of these rooms are small by current day standards. Interestingly, the hotel was promoted as a 60 room property but the report shows a total of 71 rooms, indicating that a number had already been removed from supply.

12. The conclusion reached by Simpson Hilder Associates that the property had reached the end of its natural life appears accurate. It clearly falls between the five modern hotel trading model stools of budget, coach/ group, boutique, country house and full service style. The viability report shows that the cost of rehabilitating the hotel estimated at £9.65m compared to a market value of circa £4.9m on completion. The viability gap of £4.75m is equal to almost 50% of the cost of refurbishment. This gap probably explains why, when other former Forestdale Hotel properties were being sold to other operators, The Lyndhurst Park Hotel remained in the St James's Hotel portfolio until it ceased trading.

### 3: A Brief Overview of the Accommodation Market

1. In the following paragraphs we present a very brief overview of the characteristics of the accommodation market, including both supply and demand.
2. There are two broad categories of charged-for supply: serviced and un-serviced accommodation units. Serviced accommodation includes: hotels, lodges, motels, boutique hotels, guest houses, B&Bs and full service hotels. Full service properties generally include two or more restaurants, health spa, conference & function facilities and maybe retail units. Un-serviced accommodation includes self-catering cottages/apartments, chalets, mobile homes, caravans & camping, hostels, bunk barns and boats.
3. Clearly each of the above categories provides a different level of service and comes at varying levels of cost. In serviced accommodation B&Bs and guest houses tend to be the cheapest, whilst full service hotels and country house properties tend to be the most expensive. The supply profile has changed significantly over the past 30 years. Prior to that period the bulk of rooms were offered by B&B's, 2 and 3 star hotels. 4 star hotels tended to be located in cities whilst 5 star hotels were generally only sited in major cities where the high value demand for accommodation was able to support them.
4. Identifying how many hotels and bedrooms there are in the UK is a difficult task. In 2011 figures from Melvyn Gold Consulting showed that there were 45,000 properties and 730,258 rooms. These were segmented as follows:

Hotel Ownership in UK 2011		
Ownership	Properties	Ratio
Independent	22,950	51.0
Branded Budget	8,100	18.0
Full Service	6,615	14.7
Mid Market	5,265	11.7
Consortia	2,070	4.6
<b>Total</b>	<b>45,000</b>	<b>100.0</b>

Source: Melvyn Gold Consulting

The hotels were further segmented by size:

Segmentation of Hotels by No. of Rooms			
No of Rooms	No of Properties	Rooms	Ave Size
201+ rooms	339	106,734	314.8
101-200 rooms	1,141	156,943	137.5
51-100 rooms	1,892	135,525	71.6
26-50 rooms	2,357	86,395	36.7
11-25 rooms est.	6,300	100,000	15.9
Up to 10 rooms est.	32,971	144,661	4.4
<b>Total</b>	<b>45,000</b>	<b>730,258</b>	<b>16.2</b>

Source: Melvyn Gold Consulting

5. In a report entitled Hotel Growth Forecasts 2015, PriceWaterhouseCoopers (PWC) stated that there were 464,200 hotel rooms in the regions and 135,000 rooms in London, a combined total of 599,200, some 131,000 less than the Melvyn Gold estimates. It is highly likely that PWC did not include rooms in the smaller properties. However between the two reports it is evident that there are circa 600,000 rooms in the UK.
6. A significant share of the market is held by few operators. In 2014 Hotel Analyst published a list of the top 20 hotel operators in the UK. The list is attached in Appendix A. This shows that these 20 companies own some 272,000 rooms, equal to almost 50% of the market. Premier Inn and Travelodge, placed at number 1 and 3 respectively, own 1,162 properties with 89,970 rooms between them. This is almost 15% of total supply. The first Travel Inn, as Premier Inns were then known, opened in 1987, just 29 years ago, illustrating the dramatic growth in the budget sector. This growth is set to continue with Premier Inn targeting to increase the number of rooms they own from 52,786 to 75,000 by 2018 and 85,000 by 2020. The other main hotel operators have responded by developing clear trading brands. For example The Accor Group, number four in the list, operate eight brands: Ibis, Ibis Styles, Ibis Budget, Novotel, Sofitel, Formule 1, Mercure and Mgallery. Each brand is targeted at a specific niche in the staying market.
7. The 'old style' independently operated 2 and 3 star hotels are much reduced in number as they are unable to compete with the clearly defined operating standards and marketing of the brand operators. In their report UK Hotel Forecasts 2016, PWC state: *UK room supply has grown significantly over the years and while the sector remains fragmented there have been significant structural changes over the last 20 years that have accelerated more recently. These include a continuing shift towards more branded hotels of the total market, a decline in the mid-market and the independent sector – over 50,000 rooms have closed between 2000 and 2014 alone – as demand for budget products increase.*
8. Independent operators are further disadvantaged by new models of operation and ownership, with many hotels now financed by one company and operated by another, leading to specialisation in these two important fields.
9. On the demand side, different market segments tend to be prepared to pay different levels of room rates. For example business travellers, including corporate conference delegates, tend to be prepared more per night than many leisure travellers or people visiting an area for a social function. This tendency maybe less evident since the economic downturn of 2008, but the general trend remains.
10. Even the coach market has witnessed significant change over the past few years. The 17<sup>th</sup> largest hotel operator is WA Shearings with 48 properties and 3,918 rooms. Coach companies used to be large clients of hotels. Now a few such operators own and promote tours to their own hotels where they can control costs and quality of service. Leisureplex is another operator to resort to vertical integration, owning both Alfa Travel, a coach tour operating company and 20 hotels.
11. Not only are different market segments prepared to pay different levels of room rate, but their patterns of seasonality differ also. Business demand tends to peak during weekdays outside of the main holiday periods, whilst leisure demand peaks at weekends and holiday times. Business conferences mainly occur during weekdays whilst consumer exhibitions and conferences, and social events, tend to be held at weekends.

12. As a result of these patterns of seasonality and willingness to pay, hotels seek to draw demand from each market to enable them to maximise room occupancy levels and average daily room rates. This need for a balanced business demonstrates why many of the group operators focus on cities and larger conurbations where demand is generated by several different demand segments. Variable room pricing is also designed to enable properties to focus on different market segments at different times of the week and year.
13. In their report Hotel Growth Prospects 2015 PWC include a section on 'sharing'. Sharing is a new concept ushered in by the digital age and the improved communications systems it has fostered. Sharing includes car sharing and now house sharing in the form of home owners offering space in their homes to visitors to their area. AirB&B is perhaps the best known operator in this market, but there are others including Travelmob, Onefinestay, Tripping.com, Homestay.com, Wimdu amongst them. Significantly the Accor group has just acquired a 50% share in Onefinestay, which specialises in sharing quality apartments in major cities. This confirms the seriousness with which this new concept is being taken. In their later report, UK Hotel Forecasts 2016, PWC report that some 40 million travellers have been accommodated in shared space by AirBnB worldwide since they started in 2008. Further they state that a survey of British travellers has shown that 9% have rented space in a shared home to date. PWC speculate as to whether shared space will grow in the way that budget/ lodge accommodation has done in the past 30 years. There is one significant difference between the two however – infrastructure. Shared space does not need to be built, it already exists and just needs to be made available. Growth could therefore be quicker.
14. PWC asked operators if they had felt any impact from the new source of competition. The larger groups operating higher priced properties trading in the corporate market generally reported no impact. However some operators in the provinces who majored in leisure markets did confirm that they were beginning to feel some impact from this new trend. The level of impact was not quantified but is only likely to grow.
15. Un-serviced accommodation tends to be more cost effective than serviced accommodation, with seemingly higher priced unit costs being diluted by multi-occupation for a longer period of time. In general self-catering cottages tend to draw a higher level of rental per guest than caravans, especially touring vans, whilst camping and bunk barns are also relatively cheap. With the exception of organisations like the YHA and large scale holiday site operators, there are few significant 'group operators' in this market, though there are many marketing agencies promoting cottages and boat hires, including Hoseasons and Sykes Holiday Cottages.
16. Different areas will attract a different mix of visitors due to the activities and attractions available within them. As a result area visitor average spends vary also. To demonstrate this Appendix B shows three year average tourism night and expenditure data for the New Forest local authority area, Bournemouth and Southampton. Comparison of the tourism profiles show: Bournemouth and Southampton attract 31% and 40% more day visitors respectively than the New Forest, at an increased average spend of 12% and 45% respectively. The New Forest area also attracted the lowest level of staying trips, 570,000 compared to 850,000 in Bournemouth and 630,000 in Southampton. However due to different lengths of average stay, Southampton hosted fewer nights, 1.66m than The New Forest with 1.96m. In terms of spend however The New Forest generated the lowest level at £93m compared to £181m in Bournemouth and £99m in Southampton.



#### 4: Summary of Supply and Demand for Accommodation Businesses in the New Forest Market Area

1. Whilst the following section focusses on the balance of supply and demand in the New Forest area, it should be noted that tourists do not recognise the boundaries that are often drawn around locations by tourist boards and local authorities. For example, many people visiting the Snowdonia National Park choose to stay in Llandudno or Conwy and travel into the National Park on day trips. Similarly many coach operators chose to base their tours to Cornwall in Plymouth. As a result the full economic benefits generated by an area often leak to neighbouring areas. In the case of the New Forest it is highly likely that some of the accommodation demand 'leaks' to properties located in the surrounding areas of Southampton, Ringwood and Christchurch, amongst others. Interestingly Chewton Glen, which is probably the leading hotel in the area, partly promotes itself as a base for visiting London.
2. Three year average statistics from Visit England, included in Appendix C, show that the New Forest is the 18<sup>th</sup> most visited 'city' in England during the period 2013 to 2015. They further show that the area ranks 10<sup>th</sup> in tourist numbers.
3. The New Forest area is included in general statistics shown for South East England. This area excludes London. The statistics show that the South East area has 20.6% of serviced accommodation establishments and 16.8% of serviced rooms.
4. We have acquired a copy of the accommodation database held by South East Tourism for accommodation businesses in The New Forest as at 2014. It is summarised in the table below, following the deduction of some duplicates and businesses we found to have ceased trading. These amendments totalled 12 businesses offering 193 rooms. The database does not include properties trading in the shared room market or boat moorings.

<b>Summary: South East Tourism D'base of Accommodation Businesses in The New Forest</b>					
<b>Serviced</b>	<b>Estab'mnts</b>	<b>%</b>	<b>Units</b>	<b>%</b>	<b>Beds</b>
Country House Hotel	9	2.6	163	6.7	324
Hotel	51	14.7	1,248	51.5	2,727
Restaurant with Rms	5	1.4	29	1.2	60
Activity Centre	1	0.3	26	1.1	120
B&B	267	76.7	837	34.6	1,711
Guest House	15	4.3	119	4.9	236
<b>Total Serviced</b>	<b>348</b>	<b>57.6</b>	<b>2,422</b>	<b>28.0</b>	<b>5,178</b>
<b>Un-serviced</b>					
Caravans & Camping	51	19.9	5,844	94.0	23,039
Self Catering	205	80.1	371	6.0	1,232
<b>Total Un-serviced</b>	<b>256</b>	<b>42.4</b>	<b>6,215</b>	<b>72.0</b>	<b>24,271</b>
<b>Total Businesses</b>	<b>604</b>	<b>100.0</b>	<b>8,637</b>	<b>100.0</b>	<b>29,449</b>

*Source: Tourism South East & CMA Research*

5. To put this data into perspective, the table overleaf shows the average size of serviced accommodation providers in The New Forest compared to the South East and England.

This comparison shows that the average size of serviced accommodation businesses in the New Forest is almost three times smaller than the South East average.

<b>Comparison of Serviced Accommodation Stock in New Forest, S East &amp; England</b>					
	<b>Establishments</b>	<b>Bedrooms</b>	<b>Ave No Rms</b>	<b>Bedspaces</b>	<b>Ave No Beds</b>
England	33,499	790,707	23.6	1,781,294	53.2
South East	6,899	132,848	19.3	296,589	43.0
New Forest	351	2,447	7.0	5,234	14.9

*Source: Visit England & CMA Research*

6. The average number of rooms per hotel is shown to be 24.5. This average is less than half the number of rooms that were available at the Lyndhurst Park Hotel. Only three hotels are shown by the database listing to have more than the 60 rooms available at the former Lyndhurst Park Hotel: The Premier Inn, advertised as the Premier Inn Southampton, with 67 rooms, Chewton Glen, 70 rooms, a 5 star luxury country house hotel with spa and Careys Manor Hotel, 77 rooms, also a country house hotel with 3 restaurants and a Thai spa. The implication is that for the larger hotels to succeed in this area they require either excellent facilities and service or to benefit from a national brand. Interestingly Premier Inn view the name Southampton as a greater draw than the New Forest for the branding of their property.
7. The analysis shows that 57.6% of accommodation providers offer serviced facilities but provide just 28% of the tourism units/ rooms available. 72.0% of bedspaces are therefore offered by the self-catering sector.
8. Whilst reviewing the accommodation database, it was noted that at least one property listed has ceased trading. That was the New Forest Motel. It was the largest serviced accommodation provider in the area with 90 rooms and 150 beds. We cannot identify when it closed and the latest Tripadvisor comment, recommending closure(!), was written in 2007. The closure of this property may indicate that the local market is unable to support larger, non-specialist serviced accommodation businesses due to the limited number of demand segments available.
9. A comparison of un-service accommodation shows the average number of bedspaces in this sector in the area is almost twice as high as in the South East as a whole:

<b>Comparison of Un-serviced Accommodation in England, S East &amp; New Forest</b>			
	<b>Establishments</b>	<b>Beds</b>	<b>Average No.</b>
England	34,167	1,401,070	41.0
South East	4,981	254,073	51.0
New Forest	256	24,271	94.8

*Source: Visit England & CMA Research*

10. An analysis of types of un-serviced accommodation is not available from Visit England. However they do publish data for the country as a whole and this has been used as a benchmark to measure the counts in The New Forest. This highlights the importance of caravan and camping sites to the local tourism industry.

Comparison of Un-serviced Accommodation Stock in England and The New Forest								
	England				New Forest			
	Establishments		Beds		Establishments		Beds	
	Count	%	Count	%	Count	%	Count	%
Campsites	3,715	10.9%	915,636	65.4%	51	19.9	23,039	94.9
Self/ Cat.	29,075	85.1%	327,570	23.4%	205	80.1	1,232	5.1
Other	1,376	4.0%	157,864	11.3%	0	0.0	-	0.0
England	34,166	100.0%	1,401,070	100.0%	256	100.0	24,271	100.0

Source: Visit England & CMA Research

11. The make-up of the accommodation base in the area explains why the area attracts just 20% fewer tourist overnight stay trips as Bournemouth and yet hosts almost as many nights as its south coast neighbour, enjoys a longer average length of stay (average nights per tip) but generates almost half the revenue: £72m compared to £130m. The accommodation profile strongly favours self-catering visitors and the serviced accommodation base is relatively small for an area with this level of visitation.
12. We have reviewed the New Forest Tourism Economic Impact Study 2014 and attach a copy in Appendix D. Testing these estimates against data generated by Visit England for the South East area in general indicates a strong correlation between them and the area data as a whole. It is evident therefore that the New Forest data is not based on an independent survey of local operators or any other specific programme of local market research.
13. In the previous section we noted the rise in shared accommodation. A review of the AirBnB site in May 2016 shows some 300 different shared accommodation offers in the New Forest. Some of these may be B&B accommodation providers included in South East Tourisms database trying a new means of promotion. However a review shows that many are not. This indicates two things: without their inclusion the tourism visitor data and economic estimates for The New Forest are understated and, more significantly for this review, the supply of accommodation in the area has grown significantly, though it is not recorded in official data.

## 5: Findings & Conclusions

1. The Lyndhurst Park Hotel closed in late 2014, after more than 100 years of trading as a hotel. It is possible that the general financial health of Forestdale Hotels Ltd had an impact on the property before it was sold to Akkeron Hotels and then further sold on to St James's Hotels in 2014. However St James's Hotels have retained eight of the other properties they acquired from Akkeron and these are still trading today, with one undergoing a significant programme of refurbishment. This suggest that the company did not consider investment in the Lyndhurst Park Hotel to be viable.
2. The Lyndhurst Park Hotel was trading at a loss prior to its sale. A reports at the time in the Southern Daily Echo stated that 13 full time staff and 8 casual workers had lost their jobs. If true, this level of staffing would have been totally inappropriate for a 59 room hotel and indicates that trading levels were extremely low.
3. The current CEO of St James's Hotels is Nicholas Crawley, an experienced hotelier who was mentioned in an article published in the Southern Daily Post announcing the sale of the hotel. Mr Crawley was one of the main drivers behind the establishment of Historic House Hotels and was also a senior executive in Regal/ Corus Hotels, Four Pillars Hotels and Folio Hotels, as shown in his Linked-In profile. (see: <https://uk.linkedin.com/in/nicholas-crawley-7b480122>). Given his background and apparent mandate for the St James's Hotels group, it is highly unlikely that he would have disposed of the Lyndhurst Park Hotel had he perceived that it had a trading future. Further the St James's Hotel group sold one of the other properties they acquired to Whitbread owned Premier Inns. Premier Inns is one of the most acquisitive hotel groups operating in the market, as shown previously. Premier Inn operate four properties in Southampton, one of which is actually located in the New Forest, and three in Bournemouth. It would appear that they are happy with their current portfolio in the area.
4. Mr Crawley made reference to the poor state of the building. The detailed property condition report from Simpson Hilder Associates confirms that most of the building is unsuitable for trading. The viability report estimates that an investment of some £9.649m would be required to return the property to a satisfactory condition. The subsequent value of the property is estimated to be £4.9m which clearly makes the refurbishment unviable. It is worth noting that the programme of refurbishment envisaged would still leave the hotel trading at a disadvantage to both Chewton Glen and Careys Manor Hotel, both of which are character properties in their own attractive grounds. It would therefore require another unique selling point, such as major branding, to provide the refurbished Lynhurst Park Hotel with an opportunity for success.
5. The property has been trading in one form or another for over 100 years. The last 30 years has seen many changes in hotel supply with the introduction of budget lodges, growth in brand development and a polarisation of the market at both ends of the scale, namely budget and high quality. These changes have led to the loss of over 50,000 rooms in the UK, between 2000 and 2014, and the demise of many former 3 star properties. Sadly it seems that the Lyndhurst Park Hotel is one of them, hastened by a lack of investment, uncertain management and a dated structure. It also appears that without a key trading advantage, 60 rooms may in

themselves be too many to fill at an economic room rate in this location on a consistent year round basis.

6. The New Forest is a key tourism market area. Whilst it has a significant base of serviced accommodation, its main strength appears to be in the self-catering sector.
7. In common with Llandudno and Conwy on the borders of the Snowdonia National Park, Bournemouth and Southampton are able to offer a wider range of facilities and attractions for visitors to the New Forest. These include a greater choice of restaurants, improved retail offers and a wider range of day and night entertainment. From an hotelier's perspective, they also house commercial organisations generating demand on a more consistent basis and from higher paying demand segments. The New Forest is clearly focussed on nature, the great outdoors and local museums and attractions and has a narrower market appeal for overnight visitors.
8. Total hotel stock in the New Forest was 2,422 rooms in 2014. The Lyndhurst Park Hotel's share of that was 2.5%. Total accommodation stock was 8,637 units and the hotel's share was 0.7%. The report in Appendix D shows that an estimated 11,241 jobs were supported by tourism in 2014. When the hotel closed it employed just 20 staff, 13 full time and 8 casual. Assuming these casual staff worked full time, which clearly is unlikely, the hotel's share of tourism employees was 0.2%. This overview indicates that firstly the hotel was performing far below average and also that it's loss is not significant for the local economy.

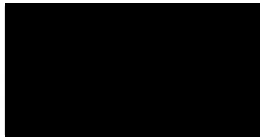
## Conclusion

9. Whilst the loss of a hotel is undesirable, it appears to have been caused by the impact of changing market forces on an aging product and part of the evolution of the accommodation market. Not only would a refurbished hotel be unviable at the levels forecast by the viability report, these levels themselves may no longer be attainable.
10. For the various reasons discussed above there appears to be no viable tourism accommodation option available for the site. Demand segments appear to be too limited in number and the site itself may not enable the business to compete with those accommodation providers that do appear to be succeeding. It maybe that the loss of this property may help to strength demand for the remaining hotels in future.
11. The economic loss of the hotel to the local tourism economy, based on its recent trading performance, is almost negligible.

## Statement

The foregoing report has been prepared by Chris Morton Associates Ltd based on information collected from the various sources accredited in the report.

All of the views and findings expressed in the report are ours alone, based on the above programme of research. In our view, the conclusions provide an accurate portrayal of the future prospects for The Lyndhurst Park Hotel.



Chris Morton FIH

Director

May 2016

## Appendix A

### List of Top 20 Hotel Operators in the UK 2014 Hotel Analyst

Position	Company	No of Rooms	Property Count
1	Whitbread	52,786	659
2	IHG	39,519	287
3	Travelodge	37,184	503
4	Accor	26,915	204
5	Hilton	24,281	114
6	Marriott	11,526	61
7	Rezidor	9,348	46
8	Britannia	8,941	48
9	GLH	8,279	36
10	Wyndham	7,835	92
11	Starwood Cap	7,641	51
12	Jurys	5,538	23
13	KSL	4,993	53
14	Macdonald	4,715	47
15	Millennium & Copthorne	4,564	19
16	Qhotels	4,019	28
17	WA Shearing	3,918	48
18	Bespoke	3,753	65
19	Imperial London	3,389	7
20	The Hotel Collection	2,856	21
	<b>Top 20 Totals</b>	<b>272,000</b>	<b>2,412</b>

Source: Hotel Analyst

## Appendix B:

### Comparison of Three Year Average Tourism Revenues in New Forest, Bournemouth and Southampton

	New Forest	B'mouth	S'thampton
Day Trips - Million	4.5	5.9	6.3
Day Trip Expenditure £m	131.6	193.6	267.3
<b>Average Spend per Day Trip</b>	<b>29.1</b>	<b>32.6</b>	<b>42.4</b>
<b>Overnight Trips</b>			
Total Trips - Million	0.61	0.87	0.67
Tourist Nights - Million	2.07	2.60	1.75
Tourist Spend £m	94.0	184.0	107.0
<b>Overnight Trip by Main Purpose of Travel</b>			
Holidays - Million	0.40	0.49	0.24
VFR Nights - Million	0.16	0.26	0.28
Business Trips - Million	0.01	0.11	0.10
<b>Total Trips - Million</b>	<b>0.57</b>	<b>0.85</b>	<b>0.63</b>
<b>Total Nights:</b>			
Holidays - Million	1.47	1.57	0.58
VFR Nights - Million	0.47	0.75	0.78
Business Trips - Million	0.02	0.25	0.30
<b>Total Nights: - Million</b>	<b>1.96</b>	<b>2.57</b>	<b>1.66</b>
<b>Spend</b>			
Holidays £m	72.0	130.0	48.0
VFR Nights - £m	20.0	24.0	29.0
Business Trips - £m	1.0	27.0	22.0
<b>Total Overnight Spend - £m</b>	<b>93.0</b>	<b>181.0</b>	<b>99.0</b>
<b>Ave Nights per Trip</b>			
Holidays	3.7	3.2	2.4
VFR Nights	3.0	2.9	2.7
Business Trips	1.4	2.4	3.0
<b>Average Spend per Night</b>			
Holidays £	48.9	82.9	82.6
VFR Nights £	42.6	32.0	37.4
Business Trips £	52.6	108.0	72.4
<b>Ave Spend per Trip in Accommodation £</b>	<b>162.30</b>	<b>211.94</b>	<b>157.89</b>
<b>Ave Spend per Night in Accommodation £</b>	<b>47.45</b>	<b>70.46</b>	<b>59.60</b>
<b>Total Expenditure £m</b>	<b>225.6</b>	<b>377.6</b>	<b>374.3</b>

Source: Visit England Analysis of Tourism Expenditure by District Council Areas



## Appendix C – South East Tourism Statistics



**Table 1: Accommodation Stock by Region**

	Establishments	Bedrooms	Bedspaces
	2014	2014	2014
<b>England</b>	<b>33,499</b>	<b>790,707</b>	<b>1,781,294</b>
North East	1,435	28,911	61,607
North West	5,005	110,618	256,395
Yorkshire/Humber	3,240	56,874	123,027
East Midlands	2,390	42,218	97,216
West Midlands	2,208	61,676	138,760
East of England	2,516	49,158	113,246
London	2,625	198,437	449,651
South East	6,899	132,848	296,589
South West	7,180	109,967	244,803

*Please note: The above information is a measure of serviced accommodation only and excludes campsites, caravans and all self-catering properties. Information on these establishments is detailed in the Non Serviced Accommodation Census*

### Most visited English Cities & Towns - 3 year average (2013-2015) by GB residents - Trips

Top 20 - Total trips (thousands)		Top 20 - Holiday trips (thousands)		Top 10 - Business trips (thousands)	
	2013-15		2013-15		2013-15
1 London	12206	1 London	3715	1 London	3223
2 Manchester	2551	2 Scarborough	1385	2 Manchester	664
3 Birmingham	2306	3 Blackpool	1086	3 Birmingham	639
4 Scarborough	1671	4 Manchester	885	4 Bristol	450
5 Bristol	1551	5 York	682	5 Leeds	345
6 Leeds	1547	6 Birmingham	637	6 Newcastle Upon Tyne	237
7 Liverpool	1406	7 Liverpool	598	7 Liverpool	198
8 Blackpool	1336	8 Skegness	594	8 Coventry	166
9 York	1244	9 Torbay	538	9 York	158
10 Newcastle Upon Tyne	1158	10 New Forest	472	10 Sheffield	156
11 Brighton	935	11 Newquay	459		
12 Sheffield	892	12 Bournemouth	450		
13 Nottingham	876	13 Leeds	413		
14 Bournemouth	848	14 Harrogate	410		
15 Bath	744	15 Bath	406		
16 Torbay	726	16 Windermere	401		
17 Harrogate	709	17 Brighton	396		
18 New Forest	699	18 Great Yarmouth	384		
19 Portsmouth	678	19 Weymouth	377		
20 Skegness	665	20 Nottingham	352		

Please note that the Great Britain Tourism Survey is designed as a national and regional survey and is therefore only robust at this level. To improve reliability three year averages have been used in the tables. However, caution should still be used as sample sizes can be low. By way of context, the volume of all overnight trips to England made by GB residents increased by +11% in 2015 compared to 2014. Those taken for holiday purposes also increased by +7%, whilst those taken for business increased by +2% against 2014.

## Appendix D:

### Estimates of The Tourism Economy in The New Forest 2014

TABLE 1: STAYING TRIPS BY ACCOMMODATION						
	UK		Overseas		Total	
Serviced	349,000	40	16,000	19	365,000	38
Non-serviced	343,000	39	36,000	43	379,000	39
Hostels/campus	1,000	0	0	0	1,000	0
Second homes	10,000	1	3,000	4	13,000	1
Boat moorings	12,000	1	0	0	12,000	1
Other	6,000	1	0	0	6,000	1
Staying with friends and	162,000	18	28,000	34	190,000	20
Total 2014	882,000		83,000		965,000	
Total 2013	876,000		81,000		957,000	
% change	0.7%		2.5%		0.8%	

TABLE 2: STAYING NIGHTS BY ACCOMMODATION						
	UK		Overseas		Total	
Serviced	838,000	28	58,000	8	896,000	25
Non-serviced	1,570,000	53	353,000	51	1,923,000	53
Hostels/campus	2,000	0	8,000	1	10,000	0
Second homes	28,000	1	33,000	5	61,000	2
Boat moorings	44,000	1	0	0	44,000	1
Other	18,000	1	0	0	18,000	0
Staying with friends and	460,000	16	245,000	35	705,000	19
Total 2014	2,961,000	3.3	696,000		3,657,000	
Total 2013	2,769,000	3.1	680,000		3,449,000	
% change	6.9%		2.4%		6.0%	

TABLE 3: STAYING SPEND BY ACCOMMODATION						
	UK		Overseas		Total	
Serviced	£77,689,000	50%	£7,266,000	22%	£84,955,000	45%
Non-serviced	£60,106,000	39%	£15,971,000	48%	£76,077,000	40%
Hostels/campus	£69,000	0%	£461,000	1%	£530,000	0%
Second homes	£1,594,000	1%	£1,502,000	4%	£3,096,000	2%
Boat moorings	£795,000	1%	£0	0%	£795,000	0%
Other	£401,000	0%	£0	0%	£401,000	0%
VFR	£14,330,000	9%	£8,402,000	25%	£22,732,000	12%
Total 2014	£154,984,000		£33,602,000		£188,586,000	
Total 2013	£146,041,000		£30,840,000		£176,881,000	
% change	6.1%		9.0%		6.6%	

TABLE 4: TOURISM DAY VISITS		
	Trips	Spend
Total 2014	8,055,00	£302,707,000
Total 2013	7,990,00	£300,104,000
% Change	0.8%	0.9%

TABLE 5: BREAKDOWN OF EXPENDITURE ASSOCIATED WITH TRIPS							
	Accomm	Shopping	Food and drink	Attractions/entertain.	Travel	Total	
UK Tourists	£47,384,000	£28,777,000	£34,087,000	£15,473,000	£29,263,000	£154,984,000	32%
Overseas tourists	£10,106,000	£9,772,000	£7,187,000	£3,438,000	£3,098,000	£33,601,000	7%
Total	£57,490,000	£38,549,000	£41,274,000	£18,911,000	£32,361,000	£188,585,000	
%	30%	20%	22%	10%	17%		
Tourist day visitors	£0	£52,368,000	£126,834,000	£29,363,000	£94,142,000	£302,707,000	62%
%	0%	17%	42%	10%	31%		

TABLE 6: TOTAL BREAKDOWN OF EXPENDITURE ASSOCIATED WITH ALL TRIPS						
	Accomm.	Shopping	Food and drink	Attractions/entertain.	Travel	Total
Total 2014	£57,490,000	£90,917,000	£168,108,000	£48,274,000	£126,503,000	£491,292,000
%	12%	19%	34%	10%	26%	
Total 2013						£476,984,000
% Change						3.0%

TABLE 7: DIRECT BUSINESS TURNOVER DERIVED FROM TRIP EXPENDITURE							
	Staying tourists		Day visitors		Total		
Accommodation	£58,316,000	33%	£2,537,000	1%	£60,853,000	14%	
Retail	£38,163,000	22%	£51,845,000	20%	£90,008,000	20%	
Catering	£40,036,000	23%	£123,029,000	46%	£163,065,000	37%	
Attraction/entertain	£19,710,000	11%	£31,155,000	12%	£50,865,000	12%	
Transport	£19,417,000	11%	£56,485,000	21%	£75,902,000	17%	
Total (adjusted)	£175,642,000		£265,051,000		£440,693,000		
Other trip-related expenditure					£11,380,000		
Total 2014 with 'other' trip related expenditure					£452,073,000		
Total 2013 with 'other' trip related expenditure					£439,542,000		
% change					2.9%		

*Note: Other trip expenditure - Apart from the spending associated with the individual trips, additional spending by non-visitors, e.g. friends and relatives with whom the visitor is visiting and/or staying with will also take place. Moreover, owners of second homes will spend some money on maintenance, repair etc.*

## The Economic Impact on Tourism on New Forest

<b>TABLE 8: TOTAL LOCAL BUSINESS TURNOVER SUPPORTED BY ALL TOURISM ACTIVITY</b>	
	<b>Total</b>
Direct	£452,073,000
Supplier/ income induced	£67,398,000
Total 2014	£519,471,000
Total 2013	£505,040,000
% change	2.9%

<b>TABLE 9: TOTAL JOBS SUPPORTED BY TOURISM EXPENDITURE</b>	
FTE 2014	7,908
FTE 2013	7,679
% change	3.0%
Actual 2014	11,241
Actual 2013	10,911
% change	3.0%

<b>TABLE 10: PROPORTION OF TOTAL JOBS SUSTAINED ACROSS ALL SECTORS</b>	
	<b>Total</b>
Total employed	53,000
Tourism employment	11,241
Tourism proportion	21%

*Total labour force is based on all employees incl. part-time working in (excludes government-supported trainees and HM Force and self-employment). The information comes from the Business Register and Employment Survey (BRES) an employer survey conducted by ONS in December of each year.*

## Appendix E

### Introduction to Chris Morton Associates Ltd

Chris Morton Associates Ltd (CMA) was formed in April 1991 by Chris Morton.

During the 20 year period prior to this Chris held a number of senior positions in the hospitality industry, including:

- Executive Director of Hamard Catering, running the leisure division and creating and opening Jacksons, a modern leisure and private membership club facility in Cardiff,
- General Manager of Best Hotels, based at the 4 star Mollington Banastre Hotel, Chester,
- General Manager of the 11 strong Fine English Hotels group,
- General Manager of a group of 16 London restaurants on behalf of Kennedy Brookes PLC, including the Michelin starred Hilaire, 5 strong Genevieve French restaurant division and Brookes Eating Houses.
- More recently Chris spent 3.5 years as Managing Director of a food production, retail, restaurant and accommodation business in N Wales.

In 1986 Chris joined international hospitality specialists Pannell Kerr Forster Associates in London and spent 3 years working on hotel market feasibility studies in the UK, Germany, France, Spain, Turkey, Ghana and Denmark. This included a 3 month secondment with Marriott Hotels in Washington.

Since forming CMA, clients have included:

The International Oil Pollution Compensation Fund, a 90+ country Governmental organisation that assists countries and business affected by oil spills. Since 1996 Chris has worked on spills in the UK, France, Spain, Japan, the Philippines and S Korea. In each case the likely impact of the oil spill on the local tourism economy has been assessed and a claims assessment team has been established and managed. As a result Chris has overseen the review of over 25,000 business interruption claims from a complete range of tourism businesses.

Virgin Active: over a 10 year period worked closely with senior management to assess the potential of over 700 potential development sites, creating a market template to identify the most profitable opportunities. Chris also supported VA through two MMC investigations to ensure that no clubs had to be sold as a result of company takeovers.

St Brides Hotel, Saundersfoot: development of a business plan to support a successful application for the largest ever development grant made to a private hotel in Wales.

Various studies have also been undertaken for the University of Sunderland and Brunel University, both market feasibility studies for the development conference facilities.

In addition several tourism development plans have been formulated for One North East and the Merseyside Partnership, whilst hotel feasibility studies have been completed for Regal Hotels (x 3) Four Pillars Hotels and Conwy County Council.

The Morecambe Project – a six year programme on behalf of Lancaster City Council and the North West Tourist Board to support the owners and operators of hotels and guest houses in Morecambe during a period of substantial redevelopment in the resort. 75 operators were members of the scheme.