

Core Strategy Review - Inspectors' Action Points

**Matter 3, Point 5 – The Housing Requirement -
Policy SS2: Housing and the Economy Growth
Strategy**

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Matter 3, Point 5 – Housing Requirement - Policy SS2: Housing and the Economy Growth Strategy

1. Introduction

- 1.1. During the hearing session for Matter 3, the Housing Requirement, the Inspectors asked how the need for accommodation for C2 uses (residential institutions) is to be met and requested a note on C2 schemes and an update on the position of the delivery of C2 schemes from the new garden settlement.

2. Update on C2 schemes

- 2.1. The Strategic Housing Market Assessment, Part 2 (EB 03.30) sets out the objectively assessed need for affordable housing, which includes C2 provision.
- 2.2. In regards to meeting the future needs of the elderly, SHMA Table 6.2 shows the amount of specialist accommodation that will be required by the population in 2037 if the current rate of occupation is maintained (119 units per 1,000 people aged 75 and over). The total additional units required to maintain the current provision to this level has been calculated as 1,279 units.
- 2.3. The current rate of provision is notably lower than the base recommended within the Strategic Housing for Older People tool (170 units per 1,000 people); therefore the SHMA also considered a scenario where the rate of use of this form of accommodation increases to this level. The total additional units required to increase the current provision to the base recommended has been calculated as 2,412 units.
- 2.4. The SHMA recommended at paragraph 6.11 that, as varying the occupation rate has such a dramatic effect on the overall requirement, it may be appropriate for the council to pursue the lower of these two figures, which is

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closer to the current expectations of older households and monitor how usage patterns develop over time.

- 2.5. The base date used for the purposes of preparing the Objectively Assessment Housing Need (OAHN) was 2014. Therefore, to determine the amount of specialist housing for the elderly to be planned for within the plan period, account has been taken of major C2 completions since the base date (2014) and deducted from the future requirement of 1,279 that was identified in the SHMA.
- 2.6. Table 1.1 presents significant C2 developments that have either been completed since 2014 or are currently under construction.

Application Ref	Description	C2 units	C3 units ≡
Planning permissions			
Y09/0062/SH Hawkinge House (Phase 2 – delivered 2017/18)	Erection of a three-storey, 112 suite care home (Class C2 use) together with ancillary facilities.	92 completed 2017/18	52
Y10/0077/SH Folkestone Care Centre Completed 2018	Outline application for 127 dwellings (Class C3) and an 80 bedroom nursing home (Class C2).	80 completed 2017/18	45
Y14/0336/SH Terlingham Gardens, Hawkinge Under Construction	Erection of retirement village (C2 use) providing 69 cottages and 52 apartments.	121 currently under construction	68
Total		293	165

Table 1.1: Major planning consents and completions for C2 schemes since 2014

- 2.7. Table 1.1 now includes reference to Hawkinge House (Phase 2), which was previously been omitted. Construction started in 2015 and was completed in 2017/18, delivering 92 additional units.
- 2.8. Considering the recent delivery of specialist housing schemes for older people at Folkestone and Hawkinge, the outstanding level of need for accommodation falling within Class C2 for the plan period to 2037 is estimated to be 985 units.

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2.9. Table 1.2 sets out how it is envisaged that the outstanding required quantum of specialist C2 accommodation will be met through the emerging development plan.

Application Ref	Description	C2 units	C3 units ≡
Policy Allocations			
Policy SS6: Garden Settlement	Policy requirement for a minimum of 10% provision (6,097 dwellings)	1,080	610
Policy CSD9: Sellindge	Policy requirement for a minimum of 10% provision	62	35
Policy UA14: Saltwood Care Centre	100% Specialist Extra Care Units	84	47
Total		1,226	692

Table 1.2: CSR and PPLP site allocations for C2 uses

2.10. The table shows a slight increase from what was previously reported, reflecting the amended policy position that would see the garden settlement delivery 6,097 dwellings – up from 5,925.

2.11. Therefore, the minimum number of C2 units expected to be delivered through the implementation of the Core Strategy Review and Places and Policies Local Plan is 1,226 units, exceeding the plan requirement by 241 units

2.12. It was raised at the examination hearing sessions that an alternative application has been submitted for Saltwood Care Centre, and that this was under consideration for 24 dwellings and a four storey building comprising 32 extra care units (ref: Y20/1608/FH), and that the site may not yield the level of C2 accommodation specified.

2.13. Policy UA15 allocated land at Saltwood Care Centre for extra care units prior to the preparation of the Core Strategy Review. At this time, there was less certainty as to the supply of housing land to meet the needs of the aging population, particularly in Hythe. The allocation was not seen to be an

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appropriate location for market housing but an exception was made for specialist accommodation, given the unmet need and its location adjoining the existing care home.

- 2.14. The case officer has advised that the current application at this stage is likely to be refused as there is no policy support for open-market residential dwellings (which prop up the viability of the extra care units) as there is no longer an overriding need for extra care to the extent that otherwise unacceptable development can be supported. As a consequence, the number of specialist C2 units proposed by the allocation is kept the same.
- 2.15. Finally, Table 1.3 list planning applications for C2 accommodation that have been submitted but not yet determined.

Application Ref	Description	C2 units	C3 units ≡
Y19/0071/FH Smith’s Medical UK Boundary Road Hythe	Outline application for up to 97 dwellings (Class C3) up to 153sqm of offices (Class B1) and up to a 66 bed care home (Class C2).	66	37
Y19/1492/FH Nickolls Quarry, Dymchurch Road, Hythe	Outline application for up to 650 dwellings (Class C3); and employment development (Class B1 up to 15,000 sqm. or sui generis/C2 uses up to 18,000 sqm)	100	56
Total		166	93

Table 1.2: Major planning applications for C2 uses - not determined

- 2.16. In addition to the application for Smith’s Medical, the revised outline application for Nickolls Quarry has now been included within Table 1.3. This seeks a proportion of the employment land set out in the original outline permission to be used for C2 uses. Given the over-supply of employment land across the district, and reservations made by the ELR that it may be difficult to attract demand for the proposed level of employment space, the principle has been

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agreed subject to other policy consideration. Discussions with the developer suggests that this will result in approximately 100 C2 units being delivered.

- 2.17. Overall, the anticipated supply of C2 accommodation over the plan period to 2036/37 is estimated to be 1,392 units, against an outstanding requirement of 985 units. This would represent an over-provision of 407 units and ensures an appropriate buffer on the identified need but also will have the positive effect of increasing the overall level of provision above the current rate of 119 per 1000 population over 75.