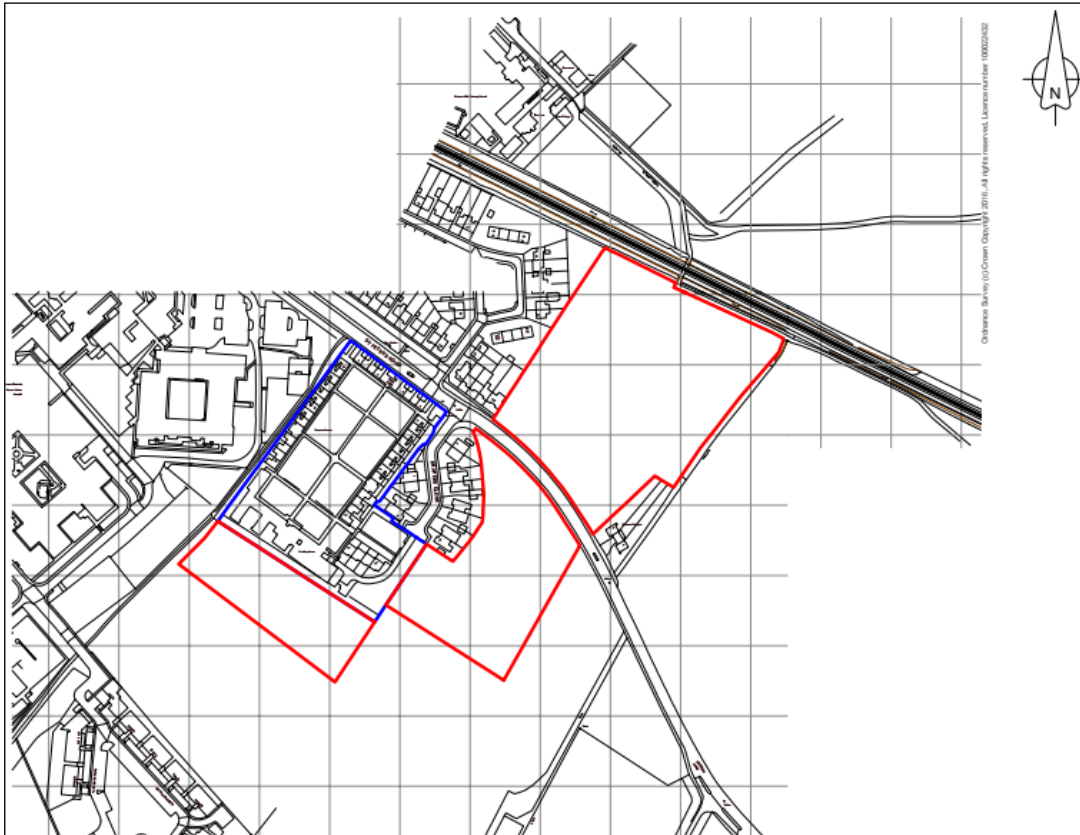


**Thanet Local Plan
Submission Version October 2018
Hearing Statement on Behalf of Quinn Estates Ltd
Matters 2, 3 and 4**

Land adjacent to Yoakley House, Margate

We have been instructed by our client, Quinn Estates ('Quinn'), to attend the Examination on Public in relation to land adjacent to Yoakley House in Margate for specialist older people's accommodation and residential development. Whilst the Council has not proposed to allocate the site, Quinn has made representations at previous stages of the Local Plan preparation process to highlight the site's suitability and availability for development. The Site is outlined in red on **Figure 1**.

Figure 1 – Location of the Site



Quinn is supporting Michael Yoakley's Charity which owns the land outlined in blue on **Figure 1**, upon which are located Drapers Almshouses and an associated care home. Drapers Almshouses were established as accommodation for the poor elderly members of Margate in 1710 following Michael Yoakley's death as a legacy of caring for his relative.

The nine original Almshouses still exist to this day and are in use, alongside 39 additional almshouses, and a 31 bed care home. Drapers Almshouses at the St Peter's Road frontage of Yoakley House are Grade II listed. The Drapers Lodge House is also Grade II listed.

The proposal is to bring forward a new 32-bed care home and residential units on the remainder of the land. Quinn considers the land to have capacity for approximately 190 residential units. On the 2006 Proposals Map the land is partly in a 'Green Wedge' and partly in an area identified for expansion of the QEQM Hospital.

Matter 2 – Objectively Assessed Need and the Housing Requirement (Policy SP11)

Issue 1 – Housing Market Area ('HMA')

In its Regulation 19 Local Plan the Council says that provision is being made for a total of 17,140 additional homes in the period to 2031. As is evident from the *Updated Assessment of Objectively Assessed Housing Need* (GL Hearn, January 2017), this is the housing need figure solely for Thanet. This does not include the need for 591 additional nursing and care home bedspaces (GL Hearn, paragraph 1.11).

GL Hearn confirms (paragraph 2.18) that it has examined Thanet as opposed to the wider Housing Market Area. Whilst the market area is unlikely to cover the whole of 'East Kent' (**Question 1**), we consider that it is likely to extend into Canterbury and Dover, not least given the significant affordability differential between the likes of Canterbury City and towns such as Margate.

The failure to take account of the wider area also calls into question the robustness of the Council's approach to the Duty to Cooperate and it also ignores evidence of in- and out-migration as identified in the sub-national population projections as well as the significant influence of Canterbury as an employment location. As such we do not consider that it accords with national guidance in the PPG (**Question 2**).

We consider that this approach will result in a failure to meet the needs for housing in the wider East Kent area (**Question 3**). Quinn has significant experience in Canterbury, including a recently-permitted development, but delivery on nearly all of Canterbury's strategic housing allocations has been severely delayed by a range of factors and the scope for additional housing development is constrained by a range of factors, including the need for additional infrastructure. In light of these issues, other local authorities should be seeking to boost delivery across the wider housing market area.

Issue 2 – Population and Household Projections

The reasons for the increase in households between the 2012 and 2014-based population projections (**Question 1**) is in part due to net migration from outside and inside of the UK. This is higher than the 2016 projections for a number of reasons (**Question 2**) including changes in assumptions about long-term net international migration, birth rates and life expectancy that have been factored into the 2016 projections. However, because of anomalies created by these projections, the Government has been clear that the 2014 projections should be used

Whilst the MIQs (**Question 5**) ask specifically about household formation rates especially in the 25-34 and 35-44 age groups, regard must also be paid to elderly persons' housing given the profile of the district's population and the need for specialist accommodation. This is, of course, a two-way matter – by providing more specialist accommodation, more general family-sized accommodation can be released back into the market to help address the need for such.

Issue 3 – London Migration

We have no comments on this issue.

Issue 4 – Market Signals

A number of questions have been posed in relation to market signals in Thanet. However, the market signals must reflect the whole of the housing market area, not just Thanet, for the reasons already noted – in particular the not insignificant amounts of migration.

Issue 5 - Housing Trajectory

The Council is proposing a stepped trajectory which proposes a significantly-higher housing target from the middle to the end of the plan period (**Question 1**) and it has been asked (**Question 2**) whether this reflects the type and size of sites proposed for new residential development in the plan. The redistribution of dwellings to later in the plan period presents a significant risk because it makes any under-delivery in the early years much

more difficult to make up in the later years of the plan period, not least when the target for later years is far greater than the delivery that has been achieved in earlier years (as is evident from the 2018 Annual Monitoring Report).

Reliance on larger sites also, generally, means reliance on a small number of larger housebuilders who are likely to release plots in a way that is economically sustainable for them, having regard to wider supply considerations. Consequently, reliance on larger sites does not necessarily boost delivery. Rather, a robust supply of smaller sites should be identified that can boost delivery in the immediate five-year period.

Issue 6 – Housing Requirement

We have no comments on the robustness of the evidence base (**Question 1**) however we do question the total number of dwellings that provision is being made for (**Question 2**). The 17,140 figure relates only to conventional, sheltered and extra-care housing and does not include care home spaces for which there is a clear identified need of 591 spaces given that there is growth in the population of older persons. Whilst there is a supportive proposed policy (**Policy HO20**), land has not been identified for such development in the draft plan. This is an issue because it means that those proposing care homes will have to compete against other land uses in an active market which reduces the certainty that land can be obtained at the right time and in the right place. Furthermore, it is highly desirable to ensure that such facilities are provided for because user groups often free-up self-contained family housing which can help meet the very pressing need for such. The land adjacent to Yoakley House presents an opportunity to cater for such needed in a highly appropriate location that will benefit from co-location with existing care facilities and access to specialist personnel and immediate proximity to the QEQM Hospital.

Montagu Evans LLP

19 March 2019