



JULY 2020

Folkestone and Hythe Hearing Statements

Matter 3 – The Housing Requirement

Iceni Projects Limited on behalf of
Quinn Estates

July 2020

ICENI PROJECTS LIMITED
ON BEHALF OF QUINN
ESTATES

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****Note: Quinn Estates only wish to comment on the above questions of this Matter.***

QUESTION 1

Has the calculation of Local Housing Need been undertaken correctly?

- 1.1 In line with the formula for calculating the Standard Method for Housing Need (as set out in the Planning Practice Guidance), we agree that the calculation of 738 dwellings per annum is correct and has been correctly adjusted since previous alterations of the Local Plan.

QUESTION 2

Is the base date of 2019/20 appropriate having regard to the use of the 2018 affordability ratio? Should the base date be 2018/19 or, alternatively, should the 2019 affordability ratio be used? If so, what effect would this have on the housing requirement?

- 1.2 In order to ensure the Council's housing requirement is accurate, reflective of under-delivery and in accordance with National Policy, the Council must either:
- A) Use a base date of 2019/2020 and calculate their Standard Method using the 2019 Affordability Ratios; or
 - B) Use a base date of 2018/2019 and calculate their Standard Method using the 2018 Affordability Ratios.
- 1.3 In accordance with PPG Paragraph 2a-011, Step 2 of calculating the Standard Method should be applied to the housing need calculation to ensure past under-delivery is accounted for, and to ensure there is no requirement to address under-delivery separately. Through using a 2018 affordability ratio (which the Council are currently applying), this is only based on housing prices until September 2018, alongside taking into account housing completions from 1 April 2018 to 31 March 2019. As a result, completions from these dates will not be reflected in the 2018 affordability ratio, as it does not consider this monitoring year. If the Council is to continue in using the 2018 affordability ratios, we request that the base date of the Plan period is amended to include the year not accounted for (i.e. 2018-2019).
- 1.4 Alternatively, if the Council wish to continue to use a base date of 2019/20, we consider the Council must use the 2019 affordability ratios which includes the past under-delivery of 2018-2019 year. This ensures, in either scenario, that the under-delivery of 2018/19 is accounted for within the Plan Period.
- 1.5 In summary, we consider at present, the Local Plan housing requirement is not appropriate given there is a year of under-supply that is not accounted for within the Plan period due to the adjustment of the base date at latter alterations of the Local Plan. The Council need to ensure one of the above changes is made to reflect the correct housing requirement in the District.
- 1.6 We also wish to comment that the affordability ratios for 2019 demonstrate that affordability is worsening in the District due to an increase of median affordability ratio from 9.24 in 2018 to 9.52 in 2019 (as outlined on ONS data). This further increases the importance for the Council to ensure that all under-delivery from 2018-2019 is considered and accounted for within their local housing need calculation.

QUESTION 4

Is the use of a consistent annual average housing figure justified and appropriate, particularly having regard to the delivery of the proposed New Garden Settlement? Would a staggered requirement be justified and if so, what should that be?

- 1.7 Quinn Estates considers that a consistent annual average housing figure should ordinarily be applied. A staggered requirement is normally a sign that a development strategy is too heavily predicated on sites with long lead-in times and potentially liable to be overdependent on such sites.
- 1.8 Whilst we agree in principle that a consistent annual average housing figure is justified, we consider that the housing trajectory should be as realistic as can be at this stage whilst being reflective and responsive of the possibility that the Garden Settlement housing yield has the risk of potentially slipping in the early years of the Plan. The Council need to ensure a flexible approach to their trajectory to have regard to the delivery of this Garden Settlement, and therefore the delivery of their housing need over the Plan period.
- 1.9 To compensate for the potential delays that the new Garden Settlement may experience through the early years of the Plan Period, the Council should seek to amend the housing trajectory to allow for sites that are able to deliver in the short term. This will ensure flexibility in ensuring their housing target is met within the Plan Period and delivery does not fall within the District.
- 1.10 Another option that we consider could be a way to address the potential under-delivery of the Garden Settlement is for the Council to apply an appropriate buffer to their housing land supply, which enables a housing target above what is required. This will enable sites to come forward within the early stages of the Local Plan, to accommodate the shortfall that may exist due to any potential delays from the Garden Settlement.