

HOUSING NEED NOTE

REFERENCE

30847

APPLICANT

Martinique Way Village Limited

SITE

Site 1, Langney Point, Martinique Way, Eastbourne

Introduction

This Housing Need Note has been prepared to provide a response to the concerns that were raised by the Planning Committee in relation to the effect of the proposed development on the local supply of standard housing and the potential impacts of the increased number of units compared to the extant scheme.

This should be considered in the context of the significant differences in the proposed use (i.e. a Class C2 extra care scheme rather than standard Class C3 housing) and the comparative nature and size of the proposed apartments.

In particular:

1. There is a substantial unmet need for additional extra care accommodation in Eastbourne;
2. Whilst the current scheme contains a higher number of apartments compared to the extant permission, the number of residents generated by both is actually very similar;
3. The application proposal will provide new homes, not holiday rentals;
4. Retirement housing will result in significant benefits for local housing supply, including the supply of family housing; and
5. The retirement community is likely to have a lower impact on the surrounding area.

These are discussed further in turn below.

There is clear evidence of a substantial need for additional extra care accommodation in Eastbourne

This note accompanies an assessment of the need for housing with care (also known as extra-care) accommodation in Eastbourne prepared by HPC. Please refer to Annex 1 for the full report.

That report should be read in full, but its key conclusions are as follows:

- There are just 128 housing with care units in Eastbourne at present;
- The HPC report demonstrates a current need for 945 housing with care units in Eastbourne, **leaving an unmet need of 817 units;**
- The number of over 75s in Eastbourne is set to increase by 35% by 2040;
- There are currently 8,000 people in Eastbourne aged 65+ and living alone;
- There are 11,000 households in Eastbourne where all occupants are aged 65+ who are under-occupying houses which could be freed up for families to live in.

It should also be noted that the Eastbourne Housing Strategy identifies a requirement for an additional 1,500 units of specialist accommodation for the elderly by 2032 (classes C2 and C3). There has been **no** delivery of class C2 housing with care accommodation since the evidence for the strategy was produced.

As a result, there is a significant unmet need for class C2 housing with care accommodation which the application proposals which will, in part, be addressed by the application proposals. This is a factor which should carry **substantial weight** in the planning balance.

The extant scheme would have generated at least a similar number of residents as the proposed retirement scheme

Concerns have been raised that the application proposal will generate significantly more residents than the extant permitted scheme. This is not actually the case, as explained further below.

As demonstrated in the table below, the extant planning permission for the site comprises a mix of 2 to 4 bedroom apartments. The proportion of 3-bed and 4-bed apartments (65% of the total units) is significantly higher than would typically be the case for a flatted development.

Furthermore, the apartments are substantially larger than required by nationally described space standards – indeed, the floorspace of each apartment is generally twice as large (or greater) as would normally be expected for an apartment. The 4-bedroom apartments are mostly penthouses and some are larger, in floorspace terms, than the 3-storey White Point houses which have already been constructed as part of the same permission (which were between 209 and 216 sqm GIA).

BEDROOMS	NUMBER	PROPORTION	FLOOR AREA	NATIONAL DESCRIBED SPACE STANDARDS
1 bed apartments	0	0%		
2 bed apartments	22	35%	99.67-112.07	39-50
3 bed apartments	27	44%	123.55-162.07	74-95
4 bed apartments	13	21%	187.87-248.15	90-117

Due to their size, it is reasonable to expect that many of the apartments would attract wealthier households from outside the local area looking for beachfront living, a second home, or, as is very likely given the seafront location, a holiday rental investment. Use of the apartments as second homes or holiday rentals would result in a lower than usual level of benefit on housing land supply, which the council recognises as falling significantly below required levels. As detailed within the submitted Planning Statement, the Borough is currently only able to demonstrate a 1.8 year supply of housing land and only 32% of the housing need has been delivered over the last three years.

In respect of occupancy, the national household size per dwelling is 2.4 people, meaning that the total occupancy for the extant consent would have been approximately 159 people, using average household sizes.

By contrast, the average occupancy of Untold Living's existing community in Wiltshire is 1.25¹, owing to the fact that the majority of the units are occupied by one person and no unit can accommodate more than 2 people. Using this average occupancy rate for the proposed development of 128 units, the total expected occupancy is likely to be around 160 people. This is broadly comparable to the extant consent despite the increase in unit numbers.

The proposed accommodation will be used as homes, not as holiday rentals

As indicated above, the larger than average approved apartments are likely to be desirable for investors, and indeed holidaymakers, seeking holiday rental opportunities in a seafront location (to attract, for example, those looking to sail from Sovereign Harbour, to visit the beach and South Downs, families on holiday, or for hen/stag weekends). There are no conditions or legal restrictions on the planning permission that would prevent this from occurring. This is expected to be the case particularly for the 4-bedroom apartments which

¹ This is slightly lower than the national average of 1.33 persons per unit identified in Knight Frank's survey of 15,500 extra-care units and 18,000 residents across the country.

do not benefit from a private garden that would usually be desirable for a larger-sized family home. These types of apartments would however be desirable for large groups looking for shared holiday rental accommodation.

By contrast, the proposal is for a class C2 use, which could not be used lawfully as holiday accommodation.

Furthermore, in light of the desirable seafront location, if we were to assume that 25% of the apartments were occupied as holiday rentals rather than as permanent housing, there is potential for occupancy levels in the extant scheme to be higher than the proposed development during popular times of the year – since a 3 or 4 bedroom apartment is much more likely to be occupied by a family of 4 or more, or by groups of friends/relatives, with even higher levels of occupancies if the proportion of rentals to market homes is greater.

Given the demographic and level of support required by the proposed occupants, it is unlikely that there will be the same level of trips to and from the site as would be seen for the extant consent, in which employment and school age occupants would be leaving the site for work, school and other day-to-day commitments. By comparison, the occupants in the proposed development would be leaving the site on an adhoc basis to see friends/family or to visit local shops, facilities, public spaces and community groups as desired. Many of these trips can be made using the site shuttle bus or pool car which will be actively endorsed by Untold Living.

AirBNB occupants are also more likely to leave the building in larger groups and take a higher number of trips per day than a senior occupant

AirBNB occupants may also lead to increased potential for heightened noise levels from the balconies and external amenity space compared to the proposed senior living scheme. It is notable that the extant scheme included a large number of balconies facing towards the dwellings on Martinique Way which could lead to disturbance at times for neighbours.

Retirement housing is much more likely to result in significant benefits for local housing supply.

This is the case for several reasons:

- a. As set out above, **there is a substantial unmet need for older people's housing**, both nationally and locally, as set out in detail in section 3.1 of our Planning Statement and expanded upon in the enclosed Housing with Care Need Assessment prepared by HPC. The report concludes that there is a significant undersupply of extra care accommodation in the Borough of 817 units, which is anticipated to rise to an undersupply of 919 by 2030.

There are only two class C2 extra care schemes in Eastbourne at present, with all other recent approvals relating to care homes or age-restricted housing (the latter offering no form of care or support):

1. **Cranbrook** – a 62 unit scheme built in 2012 and providing social rented and shared ownership accommodation;
2. **Marlborough Court** – a 66 unit privately-operated scheme built in 1999

Without suitable accommodation for the ageing population, older people will have no option than to stay in their own homes thereby reducing the amount of standard housing which would otherwise be available the younger demographic. Indeed, several attendees at the public exhibition undertaken in advance of the submission raised an interest in living the proposed development.

- b. **Providing more suitable age-appropriate housing helps to free up family housing.** As set out in the Planning Statement and the HPC report, and noted above, many older people are currently under-occupying 3- and 4-bedroom family housing which they have lived in since having families of their own. Downsizing to more age-appropriate housing helps to free up family housing, which in turn then frees up smaller housing for first time buyers as further housing is released down the chain. On average, every sale of retirement property tends to generate at least two further moves down the chain. This is a factor which has been attributed significant weight in appeals involving retirement living accommodation.²
- c. **Occupiers of the extra care scheme are more likely to currently live in the local area.** As an extra care scheme, where a care/support package is a requirement of occupying the apartment, Untold Living's residents tend to be the older elderly – more likely to be in their 80s or 90s. In their experience, the majority of residents moving to an extra care scheme tend to move within the local area, where they already have friends and family. For many older elderly, a longer distance relocation is unattractive from a health and wellbeing perspective. A study by Knight Frank indicated that 66% of people moving into an extra care community already live within 10 miles of the development, particularly those in the older age group of 85-89 years old.³ This would result in around 84 homes being freed up into the local housing supply for the wider market as a result of the proposed development.
- d. **Care accommodation helps to reduce the pressure on the NHS.** Compared with older people living in standard housing, earlier discharge from hospitals can be facilitated since ongoing recovery care can be better provided in an extra care facility. Care provision also helps to reduce the need for hospital admissions and reduces pressure on GP and A&E services. This is also a factor which has been attributed significant weight in relevant appeal decisions.

Compared to the high value nature of the extant scheme it is highly likely that the proposed development will do more for housing supply in the Borough by comparison.

² For example, the appeal by Retirement Villages at Lower Shiplake (PINS reference APP/Q3115/W/19/3220425)

³ Knight Frank, *Seniors Housing Annual Review 2022/23*,

The retirement community is likely to have a lower impact on the surrounding area.

If the extant scheme was used as regular residential accommodation, residents would be likely to be coming and going at all hours, whether to go to work, school or to carry out other daily activities. By contrast, whilst residents of the retirement community and their visitors, together with staff, would also travel to/from the building, this is likely to be to a much lesser extent.

In addition, and as indicated previously, noise levels from the proposed apartments (including balconies) are less likely to generate a heightened level of noise compared to a younger demographic.

Enc.

Annex 1 - Housing with Care Needs Assessment (HPC)