



Sheffield City Council  
Local Plan Examination  
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21<sup>st</sup> October 2024

Dear Ian,

**CHURCHILL LIVING RESPONSE TO THE SHEFFIELD PLAN: OUR CITY, OUR FUTURE EXAMINATION HOUSING NEEDS COMMENTS**

Further to the above opportunity to provide comment on the Sheffield Local Housing Needs Assessment (LHNA) as published in September 2024, we provide here some further observations.

Our Hearing Statement focussed on Matter 19: Residential Development Policies and specifically Policy NC3: Provision of Affordable Housing and Policy NC4: Housing for Independent and Supported Housing. The September 2024 LHNA provides important evidence in relation to the requirement for wheelchair housing, and particularly Part M4(3) standard housing for older persons.

Our Hearing Statement set out that the council did not possess the viability evidence base to demand that all older persons housing is provided to M4(3) standard. The September 2024 LHNA now confirms that the council do not have the necessary housing needs evidence base to make this requirement.

Table 4.13 of the study shows a need for wheelchair user homes of 2,736 from 2022-2039. Note this is from all housing types and not only older persons housing.

**Table 4.13 Estimated need for wheelchair user homes, 2022-39**

	Current need	Projected need (2022-39)	Total current and future need
Sheffield	2,359	377	2,736

*Source: Derived from a range of sources*

Table 4.10 in relation to housing for older people shows a need for 8,107 homes over the same period. It cannot be the case therefore that all housing for older people must be provided to M4(3) standard given the total need for wheelchair housing is broadly just one third of the total need for housing for older people.

We note the following recommendations from the September 2024 LNHA.

- ...information in the EHS (for 2018/19) also provides national data about wheelchair users by tenure. This showed that, at that time, around 7.1% of social tenants were wheelchair user (including 2.2% using a wheelchair indoors), compared with 3.1% of owner-occupiers (0.7% indoors). These proportions can be expected to increase with an ageing population but do highlight the likely need for a greater proportion of social (affordable) homes to be for wheelchair users. (paragraph 4.41). At paragraph 4.51 the study confirms that 69% of older person households are outright owners.

This point is particularly of note where the council may accept a commuted sum in lieu of on-site affordable housing from older persons housing but the policy still expects 100% M4(3) compliance where the need does not exist.

- As well as evidence of need, the viability challenge is particularly relevant for M4(3)(B) standards. These make properties accessible from the moment they are built and involve high additional costs that could in some cases challenge the feasibility of delivering all or any of a policy target (paragraph 4.47);
- Given the evidence, the Council could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards and around 5% of homes meeting M4(3) - wheelchair user dwellings in the market sector (a higher proportion of around 10% in the affordable sector) (4.53)
- Where the authority has nomination rights the supply of M4(3) dwellings would be wheelchair accessible dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair-user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user). It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly. (4.54)

On the basis of the updated housing needs evidence base, we continue to recommend that draft policy NC 4 should remove the following text given it is not in line with the council's evidence base relating to need or viability:

~~All specialist housing designated for older or disabled people, including supported accommodation (including hostels providing an element of care), and non-supported accommodation should be wheelchair adaptable or fully wheelchair accessible throughout. The provision of secure internal storage for mobility aids will be required.~~

Our Hearing Statement sets out a summary of the viability constraints of providing M4(3) housing which is confirmed within the council's plan wide viability assessment evidence base.

Yours sincerely,



Damien Lynch MRICS  
Associate Director - Planning Issues

