

# Sheffield Plan

## Statement by Sheffield City Council

*Revised statement issued 21<sup>st</sup> October 2024, reflecting the findings of the Local Housing Needs Assessment (EXAM 66) published 26<sup>th</sup> September 2024. Additional text in italics.*

### Matter 3: Housing Need

***Issue 2: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the provision for other housing needs?***

#### **3.7. Would the Plan deliver a diverse mix of housing types and tenures suitable to meet the needs of different groups within the community?**

3.7.1. Policy NC1 will ensure an appropriate range of housing types, tenures, sizes, densities, styles, and values is available that reflect the needs and aspirations of the existing population and future residents, particularly families with young children, and older and disabled people. In addition, Policy NC5 outlines how the development of housing will create and maintain mixed communities to meet a range of needs, by providing a mix of values, sizes, types, and tenures. Policy NC4 outlines the requirements for new homes to be designed to enable independent living, as well as specialist housing designated for older or disabled people. The provision of affordable housing will be sought through Policy NC3.

3.7.2. These policies have been positively prepared and are consistent with paragraphs 60 and 64 of the National Planning Policy Framework 2023 (NPPF), which aims to meet the identified housing need with an appropriate mix of housing types for the local community. Different groups in the community have been assessed and are reflected within the policies.

3.7.3. Some objectors to the Plan have argued that the spatial strategy will not deliver enough larger, family sized homes. However, as the Regional City within the wider city region and housing market area, it is to be expected that Sheffield will have a higher proportion of apartments in its housing stock than neighbouring districts. The SHMA (HS05) shows that based on the household survey, in 2018, the existing housing stock comprised 55% homes with 3 or more bedrooms (table 4.27) and apartments made up around 25% of the total housing stock (figure 4.9).

3.7.4. The number of apartments in Sheffield's housing stock is also lower than most of the other comparable Core Cities:

- Sheffield – 25%
- Leeds - 24%
- Manchester - 40%
- Liverpool - 29%
- Nottingham - 30%
- Birmingham - 28%

- Bristol - 38%
- Cardiff - 32%
- Newcastle - 38%

[Source: [Council Tax: stock of properties, 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/council-tax-stock-of-properties-2023). Table CTSOP 3.0: Number of properties by Council Tax band, property type and administrative area, 1993 to 2003]

- 3.7.5. New homes make up a relatively small percentage of total house sales each year and it should be remembered that the accommodation needs of Sheffield's households are met within the entirety of the housing stock including both new and older homes, the majority of which can be categorised as 'family housing'. We estimate that apartments as a proportion of the entire housing stock could potentially rise to around 31% by the end of the Plan period which is still below the current level in several of the other core cities. The estimate is based on the total number of new homes by the end of the Plan period [existing stock of 247,402 on 1st April 2022 based on the Housing Flows Reconciliation plus 34,680 net completions 2022/23 – 2038/39 = approximately 282,082 homes], compared to an estimate of the number of apartments at that time [25% of existing stock (63,831) plus up to 70% of new delivery (24,276)]. This would be comparable to the level experienced by other Core Cities including Bristol, Manchester and Newcastle in the 2011 Census (34%, 34% and 31% respectively). Note that the estimate of new homes to be delivered as apartments is likely to be on the high side. It cannot be based on full analysis of the housing trajectory due to the detail of schemes being uncertain until planning permission is granted, and the locations (and therefore likely typology of windfalls) being unknown.
- 3.7.6. Building smaller units, whether apartments, houses or bungalows, not only matches trends towards falling household sizes but also provides opportunities for people to downsize from larger homes in the suburbs. Purpose built student accommodation helps to free up lower density, larger suburban homes that are used as student accommodation.
- 3.7.7. Furthermore, a key component of the City Centre Strategic Vision (CC01, page 41) is the ambition to broaden the variety of homes on offer by creating neighbourhoods that include a mix of types and tenures. The City Centre Priority Neighbourhood Frameworks (CC03) sets out scenarios for different parts of the area, including medium density areas where family housing and apartments would be combined. For example, the Neepsend Priority Location (CC03, page 28 - 61) provides the opportunity to create a distinctive neighbourhood for a mix of demographics. It will include family housing in townhouses and larger apartments, with capacities identified on site allocations that reflect this aspiration (site allocations: KN36, KN03, KN07, KN15, KN24).
- 3.7.8. *The Local Housing Needs Assessment (LHNA) (EXAM 66) considers in detail the future mix of housing that is needed taking account of demographic change and analysis of occupancy levels within existing housing stock. Chapter 3 provides analysis of household composition and also looks at the current balance of housing in the city, based on information from the 2021*

*census. It then considers patterns of occupancy within different sectors of the housing market, taking account of constraints within the affordable sector in relation to the spare room subsidy ('bedroom tax'). The analysis also recognizes that within the market housing sector there is a significant degree of choice that leads to, and will continue to lead to, under-occupancy. However, it is also prudent to look at 'right-sizing' whereby over time households occupy homes that match more closely with their size requirements.*

3.7.9. Paragraph 3.45 sets out broad conclusions on the recommended mix of housing needed within different tenures. The table is reproduced below.

	Market	Affordable home ownership	Affordable housing (rented)	
			General needs	Older persons
1-bedroom	30%	35%	30%	55%
2-bedrooms	30%	35%	35%	45%
3-bedrooms	30%	25%	25%	
4+-bedrooms	10%	5%	10%	

Source: Icen Analysis

3.7.10. The report is clear (para 3.41, 3.47 – 3.48) that the recommended mix is a starting point, based on conclusions at a citywide level. Variations in need and mix at a local level will occur, for example taking account of local housing stock, and what housing mix is appropriate in any given location based on site-specific circumstances.

3.7.11. In conclusion, the evidence and recommendations from the LHNA support the approach of the Plan, set out in 3.7.1 above, to ensure that through its policies a diverse mix of housing types and tenures is delivered. The report is clear that there is a need for a wide range of homes across the city, in particular highlighting the significant need for smaller homes, alongside larger family homes, during the Plan period.

### **3.8. What is the annual need for affordable housing and the total affordable housing need over the Plan period?**

3.8.1. The Strategic Housing Market Assessment 2018 (SHMA) (HS05) identifies a shortfall of 902 affordable homes per year in Sheffield (Table 6.1). This includes an element of need that assumes the total backlog of outstanding need at the point of the calculation (8,386 households) would be dealt with over a 5-year period (i.e. 1,677 per year) (paragraph 6.5). The assessment calculates newly arising need as 1,891 households each year. Total annual affordable need therefore equates to 3,568 homes, set against an annually arising supply of 2,666 affordable homes, resulting in an annual shortfall of 902 affordable homes taking account of both the need to reduce backlog, and newly arising need.

3.8.2. The affordable housing shortfall calculated by the SHMA was not intended to cover the entirety of the Sheffield Plan period, as it is effectively calculated for a 5-year period, so caution must be exercised in using it to estimate the total level of affordable housing over the period to 2039. Notwithstanding that,

based on the shortfall of 902 affordable homes each year the total affordable housing need over the Plan period would be 15,334 homes (902 x 17 years [2022/23 – 2038/39]).

- 3.8.3. The figure of 15,334 homes, over-represents the initial backlog identified in the 2018 SHMA and results in it being continually dealt with throughout the Plan period, rather than over just a 5-year period as set out in the calculation of affordable housing shortfall. Multiplying this up across the Plan period would result in the backlog being included in the total figure 3.2 times. Whilst this likely results in an over-estimate over the total affordable housing need, it is counteracted by other factors that have changed since the SHMA was carried out that themselves would impact the figure. Whilst it would be possible to take out the figure of 1,677 homes per year, it would not be considered appropriate because there is a backlog that needs to be dealt with and, given how the calculation works in relation to supply, it would create an anomalous figure.
- 3.8.4. Further reasons why the 15,334 figure is considered appropriate, are changes in the housing market including increased rents, house prices and interest rates will have affected affordability ratios and therefore particularly the ability of newly forming households to meet their housing needs on the open market. That is likely to affect the newly arising affordable housing need when the SHMA is refreshed. Furthermore, as documented in relation to question 3.9 below, new affordable homes delivered over the past 5-year period (1,005 total completions) have not been sufficient to meet the backlog, so that figure will also have changed.
- 3.8.5. It is therefore considered appropriate to use the annual shortfall of 902 affordable homes as a proxy for considering the overall level of need for affordable homes across the Plan period. This gives a figure which is significantly above the level of new affordable homes that would be able to be met through planning policy alone, when taking account of viability. The Whole Plan Viability Assessment (VI01) considers a range of affordable housing delivery scenarios across different areas of the city and concludes that broadly, a 10% affordable housing target is appropriate (paragraph 12.115) with up to 30% in limited (higher value) areas (Table 12.13).
- 3.8.6. *The LHNA (EXAM 66) provides an up-to-date position on the annual need for new affordable homes. Table 2.14 sets out the elements of affordable need for each housing market area and estimates a total overall need of 2,032 affordable homes per annum.*
- 3.8.7. *This is made up of 362 households with a current need for affordable housing, 2,745 newly forming households needing affordable housing and 1,160 existing households falling into need, resulting in a gross annual need of 4,267. When set against the annual supply of affordable housing through re-let and resale, the net affordable housing need is 2,032. It is critical to understand the components that make up the total annual need in order to assess how those needs can be met.*
- 3.8.8. *Table 2.15 provides further analysis that explains that the majority of the*

*affordable housing need (1,676 p.a.) is from households that are unable to rent or buy in the market. 357 households would be in a position to rent in the market but not buy. It is worth noting that analysis is carried out by sub area level and compares incomes to local house prices and rents in those areas. In reality, as highlighted in paragraph 2.43, households can meet their housing needs in any part of the city, or elsewhere. Sensitivity testing indicates that if household incomes were assessed in relation to the most affordable locations in the city there would be a notably lower estimated level of affordable need (1,187 pa rather than 2,032 pa) (paragraph 2.44 and table 2.17).*

- 3.8.9. *Furthermore, it should be noted that many of those in affordable housing need are already living in accommodation (paragraph 2.49). Whilst the needs of those households should not be minimized, and may be acute, it is more reflective of the need to ensure households can access the most appropriate tenure of housing, than that additional housing stock is required to meet their needs. Only around 693 of the affordable homes needed per year are required by those not already living in accommodation.*
- 3.8.10. *The LHNA does not provide a figure for the total affordable housing need over the Plan period. When considering the total affordable housing need across the Plan period, the report is clear (paragraph 2.52) that the estimated need is on a per annum basis and should not be multiplied by the Plan period to get a total need. This is because the estimates are for the number of households who would be expected to have a need in any given year, based on financial ability to access the housing market. However, in reality, household circumstances change over time and they may fall out of need. For example, newly forming households' incomes may rise. Paragraph 2.55 also notes that over time newly forming households will become 'existing' households who may need affordable housing, but would effectively be double counted if the annual figure is multiplied up across the Plan period.*
- 3.8.11. *A further factor is the reality that households may pay more than 30% of their income on housing. This means they have been included within the model as being in need of affordable housing, when they are already accessing the housing market (albeit at a cost above the level that would usually be considered reasonable).*
- 3.8.12. *An important role for the Plan is to seek to deliver affordable housing through new development (Policy NC3); but new housing cannot meet all affordable need in Sheffield, and not all those households in need require additional homes, but rather their accommodation needs will need to be addressed through other mechanisms. The Council is working with partners to enable delivery of affordable housing through a wide range of other measures in addition to the Plan.*
- 3.9. Has the need for affordable housing been accurately calculated and based on robust, up-to date data? Has this need been calculated in accordance with the Planning Practice Guidance? What is the past record for affordable housing completions and forms of delivery? How**

**does the Council consider this will change in the future?**

- 3.9.1. The need for affordable housing set out in the SHMA (HS05) has been accurately calculated based on robust, up-to-date data at the time of publication. *However, that analysis has been supplemented by the recently completed LHNA (EXAM 66).*
- 3.9.2. Planning Practice Guidance on housing and economic development needs assessments has been updated since the SHMA analysis was completed (Paragraphs 018 to 024 Reference ID: 2a-018-20190220 – 2a- 024-20190220, updated 20 February 2019). However, the SHMA methodology for calculating affordable housing needs, described in the housing needs model (Table 6.1 and Chapter 6) sets out the approach which is consistent with the steps in the PPG. ~~The Council has recently started the process of commissioning a new Housing Needs Assessment, but this is unlikely to be completed for several months.~~ Delivery of affordable housing units over the past 10 years, disaggregated by tenure, is presented in Table 1 below. This is taken from live tables on affordable housing supply, Table 1011c: additional affordable housing supply, detailed breakdown by local authority, completions [Live tables on affordable housing supply - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/live-tables-on-affordable-housing-supply):

**Table 1: Affordable housing delivery by tenure 2013/14 to 2022/23**

	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	TOTAL
<b>Social rent</b>	98	39	127	3	0	2	97	0	0	22	<b>388</b>
<b>Affordable rent</b>	78	503	148	310	91	161	32	205	86	283	<b>1,897</b>
<b>Intermediate rent</b>	0	0	4	0	0	0	0	0	0	0	<b>4</b>
<b>Shared ownership</b>	0	0	11	14	8	2	0	2	45	68	<b>150</b>
<b>Affordable home ownership</b>	22	26	15	0	0	0	0	0	0	0	<b>63</b>
<b>TOTAL</b>	198	568	305	327	99	165	129	207	131	373	<b>2,502</b>

- 3.9.3. Past delivery of affordable housing and the various forms of delivery since the

Sheffield Core Strategy base date (2004/05) up to 2022/23 is presented in the Table 2 below. Table 3 illustrates the scale of financial contributions towards affordable housing over the period since 2012/13.

**Table 2: Affordable housing delivery by mechanism 2004/05 to 2022/23**

Form of Delivery	Affordable Housing units delivered between 2004/05 and 2022/23
New Builds (not including s106 new build delivery)	2,849
s106 units	228
Acquisitions	1,175
<b>Total</b>	<b>4,252</b>

Source: [Live tables on affordable housing supply - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/datasets/live-tables-on-affordable-housing-supply)

**Table 3: Financial contributions towards affordable housing 2012/13 to 2022/23**

Year	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Total
Financial contributions from planning obligations (s106) held at the start of the year (£000s)	0	1,000	1,000	1,000	1,034	4,653	6,584	7,635	10,333	12,328	11,773	
Financial contributions from planning obligations (s106) received during financial year (£000s)	2,000	0	0	685	2,974	1,768	1,051	2,698	2,505	639	1,057	15,377

Source: [Local Authority Housing Statistics Open Data 1978-79 to 2022-23](https://www.sheffield.gov.uk/transparent-local-government/open-data/local-authority-housing-statistics-open-data-1978-79-to-2022-23)

- 3.9.4. The Council is committed to delivery of affordable housing. The recently approved Council Plan (2024-2029) sets the strategic outcome of creating great neighbourhoods that people are happy to call home. Within this, a priority over the next 4 years is to increase the availability, quality and range of housing in the city's neighbourhoods. This includes increasing the provision of Council and other affordable homes. An important element driving delivery of new affordable homes is the Sheffield Together Housing Growth Board; a partnership between the Council, South Yorkshire Mayoral Combined Authority, Homes England, the Sheffield Property Association and key local housing associations. The Homes England Statement of Common Ground (EXAM4A) details the objectives of the Board, including preparation of a five-year rolling Integrated Affordable Housing Programme.
- 3.9.5. Whilst delivery of affordable housing will continue to be challenging, particularly in relation to viability, the Council's continued commitment to funding mechanisms that deliver new homes was recently approved as part of

the budget in the Capital Strategy and Budget Book 2024-2054 (approved at full Council on 6th March 2024<sup>1</sup>). This includes specialist Council housing stock to address the needs of older people as well as general needs Council housing stock and acquisitions of new build units directly from developers to increase the stock of affordable housing and broaden tenure mix (page 74 – 77).

- 3.9.6. *The LHNA (EXAM 66) provides additional insight into the analysis provided in paragraphs 3.9.1 – 3.9.4 above. It establishes an updated calculation of the need for affordable housing, based on robust, up-to-date data.*
- 3.9.7. *The need for affordable housing has been calculated in accordance with Planning Practice Guidance (confirmed in paragraph 2.6). To summarise; the methodology looks at the current affordable housing need as well as projected newly forming households in need and existing households falling into need, and considers this in relation to the supply of affordable housing from existing stock.*
- 3.9.8. *The data used within different elements of the calculation is based on the most up to date relevant evidence, drawn from a variety of sources. For example, evidence related to the cost of housing is taken at summer 2024. Data taken from other time periods has been reprofiled where appropriate. For example, ONS household income estimates are 2020 based but the calculation has estimated how much these are likely to have changed based on ASHE estimates (para 2.12).*
- 3.9.9. *Table 2.6 sets out the main sources for assessing the current need for affordable housing, taking account of the sources identified in Planning Practice Guidance (2a-020). These sources are considered robust, and up to date, and include data drawn from statutory data published by MHCLG and the 2021 Census.*
- 3.9.10. *The Council considers that the LHNE provides an accurate and robust, up-to-date position on the need for affordable housing in the city.*

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### **3.10. How does the need for affordable housing compare to the housing requirement figure for Sheffield set out in Policy SP1 a)?**

- 3.10.1. A high level of affordable homes are needed in Sheffield to ensure that people have access to housing that meets their housing needs. The full assessed annual shortfall of 902 homes represents around 43% of the gross requirement of 2,090 homes per year in Policy SP1a.
- 3.10.2. It is important to note that the affordable housing annual shortfall cannot be compared directly to the housing requirement figure set out in Policy SP1a for a number of reasons relating to how they are derived. The housing

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<sup>1</sup> See p75 [Capital Strategy and Budget Book 2024-2054.pdf \(sheffield.gov.uk\)](#)

requirement, taking the Local Housing Need figure as a starting point, does not distinguish between the types of housing that will be required over the Plan period, including affordable housing. It is derived from a calculation that considers population change and factors that influence that. On the other hand, the affordable housing need figure is built up from an analysis of specific elements of the housing market and the interaction between household income and access to sectors of the housing market. This analysis is primarily about understanding households' housing need and how it is met through both new provision of affordable housing, and re-lets of existing stock, rather than considering growth in the overall number of households in the city.

- 3.10.3. The SHMA explains clearly that *'the level of affordable housing need identified in this report should not be interpreted as a subset, or proportion, of the overall housing requirement ... housing needs reflect a wide range of circumstances including, but not limited to, a lack of affordability. This signals an increasing need for a focus on regeneration and stock condition as well as affordability, and therefore analysis or policy which expresses affordable housing need as a quantitative proportion of the overall requirement will not reflect these additional ways that need can be met'* (HS05, paragraph 8.6).
- 3.10.4. *As noted above in relation to question 3.8 the level of affordable housing need is calculated as being 2,032 homes per annum, which is only slightly lower than the annual housing requirement set out in policy SP1 of the Plan. The LHNA (EXAM 66) provides a helpful context for understanding the relationship between the level of affordable housing need calculated and the Plan's housing requirement. Paragraphs 2.46 – 2.58 set out the different elements contained within the affordable housing need figure, and how those factors relate to the overall need for new homes. Critically, it notes that paragraph 67-001 of the Planning Practice Guidance states that the housing needs of particular groups of people may exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method.*
- 3.10.5. *The report is clear that affordable housing need and overall housing need cannot simply be arithmetically linked. Firstly, the affordable housing model contains households who are projected as falling into affordable housing need, but these households already have accommodation and if they were to move to alternative accommodation (including affordable) that would release a dwelling for another household thus not creating any additional need. Secondly, newly arising households are a direct output of demographic modelling (household formation) and therefore already included in housing need figures that use household formation as a base.*
- 3.10.6. *In summary, the affordable housing need figure calculated in the LHNA represents a substantial increase on the previous level of need. It should be understood in the context of the different elements of need, recognizing that a variety of mechanisms are needed to ensure that people in Sheffield can access accommodation that is appropriate. However, it is not straightforward to compare the level of need directly with the housing requirement in the Plan.*

**3.11. Based on the requirements for particular Affordable Housing Market Areas, how many affordable homes is the Plan expected to deliver? How does this compare to the identified need? If needs will not be met, what alternative options has the Council considered?**

3.11.1. Based on the requirements across the Affordable Housing Market Areas set out in policy NC3, the sites in the Plan housing trajectory could potentially deliver up to 3,003 additional affordable homes (equivalent to 177 per year across the 17-year Plan period). When compared to the total affordable housing need over the Plan period of 15,334 homes, this equates to 20% of the identified need. Table 4 below provides an overview of the supply of the additional 3,003 affordable homes, expected to be delivered from 2022 to 2039:

**Table 4: Sheffield: Estimated affordable housing delivery – through new build and S106 new build, 2022-2039**

	<b>2022/23 Actual</b>	<b>2023/24 to 2028/29 Estimate (6 years)</b> <i>Sites without permission assume 50% of the Policy Requirement NC3</i>	<b>2029/30 to 2038/39 Estimate (10 years)</b> <i>Sites without permission assume 100% of the Policy Requirement NC3</i>	<b>Total</b>
<b>(a) Large sites with planning permission</b>		<b>388</b>	<b>17</b>	<b>405</b>
<i>Total Number of Units (Market)</i>		331	17	348
<i>Affordable Housing Units</i>		<b>57</b>	<b>0</b>	<b>57</b>
<b>(b) Proposed allocated sites with permission</b>		<b>8,730</b>	<b>1,022</b>	<b>9,752</b>
<i>Total Number of Units (Market)</i>		8,143	836	8,979
<i>Affordable Housing Units</i>		<b>587</b>	<b>186</b>	<b>773</b>
<b>(c) Proposed allocated sites without permission</b>		<b>3,098</b>	<b>13,779</b>	<b>16,877</b>
<i>Total Number of Units (Market)</i>		2,941	12,370	15,311
<i>Affordable Housing Units</i>		<b>157</b>	<b>1,409</b>	<b>1,566</b>
<b>Affordable Housing Sub-total Supply</b>	<b>140*</b>	<b>801</b>	<b>1,595</b>	<b>2,536</b>
<b>Plus Affordable Housing Large Windfall (10% of 4,675 units)</b>	<b>0</b>	<b>175</b>	<b>292</b>	<b>468</b>
<b>AFFORDABLE HOUSING TOTAL SUPPLY</b>	<b>140</b>	<b>976</b>	<b>1,887</b>	<b>3,003</b>
<b>Affordable Housing Need (902 per year)</b>	902	5,412	9,020	<b>15,334</b>
Number of dwellings above/below requirement	-762	-4,436	-7,133	-12,331

\*140 new build affordable units completed in 2022/23 as published in the Local Authority Housing Statistics data return 2022/23 (Local Authority Housing Statistics data returns for 2022 to 2023 -

- 3.11.2. The inclusion of existing affordable homes committed on sites with planning permission adds 830 units over the Plan period (see large sites with planning permission and proposed allocated sites with permission in Table 4). This includes 6 sites within the Council Stock Increase Programme (475 affordable units), 4 sites by Registered Providers (275 affordable units) which will deliver 100% affordable housing, and the remaining secured through S106 agreements or Council acquisitions.
- 3.11.3. Applying the requirements of policy NC3 across the site allocations without planning permission, could potentially deliver up to 1,566 units to 2039 (see proposed allocated sites without permission in Table 4). This includes 3 sites within the Council Stock Increase Programme (276 units) which will deliver 100% affordable housing.
- 3.11.4. Included within the trajectory is an estimate for large windfall sites of 468 units. This is based on the assumption that equivalent to 10% of homes on large windfall sites come forwards as affordable housing (4,675 estimated supply from developable sites in Broad Locations for Growth and other areas x 10% = 468 rounded).
- 3.11.5. The £11,773,000 agreed as financial contributions from sites with planning permission (Table 4 above) has been allocated to the Council Stock Increase Programme to add to the affordable stock in the city (see paragraph 3.8.4-3.8.5 above).
- 3.11.6. In practice, limits on the public subsidy that is available for affordable housing and viability difficulties on market housing sites will mean that the full policy requirements are unlikely to be met on every site from the date the Plan is adopted. It is difficult to forecast, but the Council estimates that 1,566 affordable homes could be delivered on the site allocations without planning permission. This assumes that 50% of the policy requirement under NC3 is achieved up to 2028/29, and then 100% policy requirement from 2029/30 to 2038/39.
- 3.11.7. Provision of affordable housing resulting from the requirements of Policy NC3 will not by itself meet the identified shortfall of affordable housing. However, as noted in response to question 3.8.4-3.8.5 above, the Council is committed to increasing affordable housing provision through a range of mechanisms, including further work on its own Stock Increase Programme sites and in partnership with housing associations and Homes England through the Sheffield Together Housing Growth Board.
- 3.11.8. *The LHNA (EXAM 66) does not focus on delivery of new affordable homes, although it is helpful in indicating how that need arises and therefore highlighting that needs will be met through different mechanisms. The findings of the LHNA will be reflected in the Council's forthcoming Housing Growth Delivery Plan which will include actions relating to delivery of affordable housing through both the Plan and other mechanisms. This includes direct delivery of affordable housing through the Stock Increase*

*Programme and disposal of land for 100% affordable housing, housing led regeneration to revitalize existing neighbourhoods, such as Attercliffe, and continuing to support housing associations to deliver new homes.*

**3.13. What are the identified needs for specialist housing, for example housing for older and disabled people and student accommodation, within the overall housing need for Sheffield? How will these needs be met?**

- 3.13.1. Student accommodation needs were identified through the Purpose-Built Student Accommodation Market Study (HS08). The study indicates that there is currently a position of oversupply within the PBSA market. Based on this evidence the Plan makes no additional requirement for delivery of student accommodation to meet needs, over and above those schemes already committed. Policy NC6 will be used to guide future development of Purpose-Built Student Accommodation, when planning applications are received.
- 3.13.2. The Accessible and Adaptable Housing Optional Technical Standard Topic Note (EXAM 22) sets out the scale of need across the city for housing that meets the needs of older people, and disabled people. In particular, paragraphs 3.1-3.8 summarise the evidence base relating to the growth in the older population going forwards. Paragraphs 3.9 – 3.16 highlight the number of people across Sheffield who, in the most recent Census, identified themselves as being disabled and having a physical or mental health condition that 'limited their ability to carry out day-to-day activities a lot'. The Topic Note also indicates the number of households where someone is living with needs that might require specialist or adapted accommodation.
- 3.13.3. Policy NC4 seeks to meet, as far as possible, the needs of older people and disabled people within new homes delivered over the Plan period. The approach taken in the policy recognises that new homes make up only a small proportion of overall housing stock in the city. Therefore, in order to make a marked impact on the general needs housing options available to people who want to live independently, as many new homes as possible should be designed to be accessible and/or adaptable.
- 3.13.4. The policy supports delivery of specialist housing that is designated for older people or disabled people in areas where it is needed and particularly where it would deliver accommodation that is located where people can most usefully benefit from good access to services and facilities to enable independent living.
- 3.13.5. *The needs of older and disabled people are considered in detail in Chapter 4 of the LHNA (EXAM 66). This section sets out the evidence on projected growth of the older persons population over the Plan period, and considers the likely impact in terms of both tenure and size of housing required. The report also uses data from the 2021 census to examine the number of households that contain someone with a disability and the interplay between age and disability which impacts housing requirements.*

- 3.13.6. *Taking account of the current supply of housing with support and housing with care across different sub-areas (table 4.8) alongside 'prevalence rates' of accommodation needed by older people (paragraph 4.27), table 4.10 sets out the total shortfall of different aspects of specialist housing that will be needed by the end of the Plan period. There will be a particular need for housing with support in both the affordable sector (3,716 units) and market sector (2,284 units), as well as a need for housing with care (e.g. extra care) in both the market and affordable sectors.*
- 3.13.7. *Importantly the report notes, in paragraph 4.35, that there is a need for a range of products within any category of older persons housing and that the trend for market schemes to be focused at the top end of the market has resulted in them only being affordable to a small proportion of the market.*
- 3.13.8. *Specific analysis in the report about households that contain a wheelchair user (3.4% of households nationally) has been combined with evidence about the household age structure in Sheffield and adjusted to take account of relative health by age. Table 4.12 brings this together with the conclusion that there will be around 1,500 more households with a wheelchair user by the end of the Plan period. The report then goes on to consider how many of those households would need specialist accommodation; concluding in paragraph 4.40 that this would equate to 2,736 homes over the Plan period or 161 per annum. This represents 7.9% of the annual housing requirement set out in policy SP1.*
- 3.13.9. *Paragraph 4.41 indicates that typically, based on the English Housing Survey, more social tenants are wheelchair users than owner occupiers. The report concludes (para 4.42) that, to meet the need that has been identified, the Council could seek a proportion (up to 5%) of all new market homes to be M4(3) compliant, with the potential to seek a higher figure in the affordable sector. Policy NC4 requires 2% of new homes in developments of 50 or more homes to be wheelchair adaptable (M4(3)), which reflects the need to ensure viability, balancing this alongside other policy objectives in relation to environmentally sustainable design and the need to deliver affordable housing. The findings of the LHNA support the approach taken in the Plan to meet these needs.*