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Sheffield Plan: Our City, Our Future

Examination in Public

Comments on the Sheffield LHNA, Icen Projects, September 2024

The Planning Bureau on behalf of

McCarthy & Stone Retirement Lifestyles Ltd.

October 2024

1.0 **MCCARTHY STONE RESPONSE TO CONSULTATION ON THE SHEFFIELD LHNA, ICENI PROJECTS, SEPTEMBER 2024**

1.1 Thank you for the opportunity to comment on the Sheffield LHNA, Iceni projects, September 2024 (LHNA). McCarthy Stone is the leading provider of specialist housing for older people in the UK. We responded to the council's regulation 19 consultation as well as submitting a hearing statement for Matter 19 with respect to polices NC3 (Provision of Affordable housing) and NC4 (Housing for independent and Supported Living). The statement summaries our concerns as well as highlighting where in the new LNHA our position is supported.

1.2` In summary our response to the regulation 19 consultation and Matter 19 hearing statement confirmed that:

- The viability evidence shows sheltered and extra care housing to be **substantially not viable** with any level of affordable housing (table 10.12).
- Such a requirement will undermine the deliverability of the plan and creates an unrealistic policy expectation contrary to para 002 ref ID: 10-002-20190509 of the PPG on Viability and paragraph 34 of the NPPF that requires such policies to not undermine the deliverability of the plan.
- Having tested the sheltered and extra care typology at the plan making stage and the typology found to be **substantially unviable**, applicants should not then be required to assess viability further at the decision making stage. Such a requirement is again contrary to para 002 ref ID: 10-002-20190509 of the PPG on Viability
- Introducing a different or nil affordable housing requirement for sheltered and extra care housing would be consistent with the typology approach advocated in para 004 ref ID: 10-004-20190509 of the PPG on Viability.
- Para 007 ref ID: 10-007 -20190509 of the PPG which the council rely on to justify asking for affordable housing from sheltered and extra care housing confirm the circumstances where Viability Assessment is appropriate at the decisions making state. For clarification this says '*for example where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan*'. Sheltered and Extra care housing has been treated at the plan making stage and its outcome should be incorporated into the plan to make it sound. We believe that the above is a misinterpretation of paragraph 007 of the PPG which is merely highlighting nonstandard housing typologies which may not have been tested at the plan level.
- Policy NC4 currently requires specialist housing for older people to deliver 100% M4(3) housing. This requirement is not justified or supported in evidence. Older persons housing has been found to be substantially unviable already. The Viability Study has not included the additional cost of the 100% M4 (3) policy requirement for older persons housing schemes. Such a requirement to deliver 100% M4 (3) would increase build cost by approximately £819,000 for a typical scheme using the Viability consultants own costs.
- The 2018 Sheffield SHMA in addition does not support the need for older persons housing to be built to 100% M4(3) standards.

1.3 Having considered the 2024 LHNA, we confirm that the position above with respect to the need for specialist housing for older people to be built to 100% M4(3) standards as advocated in Policy NC4 **is again not supported or justified by the LHNA and should be removed from the policy.** To note of importance are the following tables:

- Table 4.10 shows a large need for housing with support (sheltered) of 6,000 units by 2039 and for housing with care (extra care) of 2,107 units by 2039.
- Table 4.11 identifies that 93.1% of over 65's **do not use a wheelchair**, meaning that **only 6.9% of over 65's use a wheelchair.**
- 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.

1.4 In addition, the following paragraphs within the LHNA are relevant:

Para 4.41 'Furthermore, 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.'

Para 4.42 'To meet the identified need, the Council could seek a proportion (potentially up to 5%) of all new market homes to be M4(3) compliant and potentially a higher figure in the affordable sector (potentially up to 10%). These figures reflect that not all sites would be able to deliver homes of this type. In the market sector these homes would be M4(3)A (adaptable) and M4(3)B (accessible) for affordable housing.'

Para 4.43 'As with M4(2) homes it may not be possible for some schemes to be built to these higher standards due to built-form, topography, flooding etc. Furthermore, provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build out costs (see table below).

Para 4.48 It should be noted that local authorities only have the right to request M4(3)(B) accessible compliance from homes for which they have nomination rights. They can, however, request M4(3)(A) adaptable compliance from the wider (market) housing stock.

Para 4.49 A further option for the Council would be to consider seeking a higher contribution, where it is viable to do so, from those homes to which they have nomination rights. This would address any under delivery from other schemes (including schemes due to their size e.g. less than 10 units or 1,000 square metres) but also recognise the fact that there is a higher prevalence for wheelchair use within social rent tenures. This should be considered when setting policy.

Para 4.53 This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair-user dwellings as well as providing specific provision of older persons housing. 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). This is slightly higher than the emerging Local Plan which seeks 2% only on schemes of 50 or more new homes.

Para 4.55 In framing policies for the provision of specialist older persons accommodation, the Council will need to consider a range of issues. This will include the different use classes of accommodation (i.e. C2 vs. C3) and requirements for affordable housing contributions (linked to this the viability of provision). There may also be some practical issues to consider, such as the ability of any individual development being mixed tenure given the way care and support services are paid for).

1.5 The above extracts therefore re-confirm that as well as not being supported to viability evidence there is no needs- based evidence for the council to be requesting a higher M4 (3) requirement than mainstream housing.

1.6 Therefore, requiring all supported accommodation and older people's housing to be wheelchair adaptable and accessible would create a large additional cost that has not been incorporated within the council's viability evidence. Requiring such housing to deliver 100% M4(3) housing is not supported in needs or viability evidence and therefore not justified or consistent with national policy. Policy NC4 therefore will not be effective. This element of the policy should therefore be removed with the requirement consistent with mainstream housing.

1.7 For the plan to be in line with national policy, justified and effective policy NC 4 should be amended as follows.

~~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.~~