

From: [REDACTED]
To: [REDACTED]
Subject: GRL - Regulation 19 Draft Sheffield Plan
Date: 20 February 2023 11:35:59
Attachments: [GRL - Regulation 19 Draft Sheffield Plan \(Feb 22\).pdf](#)

Dear Sirs,

Please find attached a representation to the Regulation 19 Draft Sheffield Plan on behalf of Gladman Retirement Living Ltd. I would be grateful for confirmation of safe receipt of this email and attachment.

Please let me know if you require any further information.

Kind Regards,

ROB GASKELL

Planning Manager



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Gladman Retirement Living Ltd

**Sheffield Plan: Our City, Our Future
Publication (Pre-Submission) Draft**

February 2023

GLADMAN
RETIREMENT LIVING LIMITED

1. Introduction

- 1.1 Gladman Retirement Living, under the Adlington Retirement Living (ARL) brand, provide high quality, specialist retirement apartments with extensive communal facilities for elderly people in need of care (Use Class C2).
- 1.2 Society is ageing and more people require housing that meets their needs as they age. Between 2014 and 2039, over 70 per cent of projected household growth will be made up of households with someone aged 60 or older. It is therefore unsurprising that there is an identified critical¹ national need to provide appropriate housing for our ageing population.
- 1.3 ARL works with Registered Care Providers to provide retirement apartments for people requiring care. Residents purchase their own apartment and live as independently as they can but also have the reassurance of 24-hour on-site care and support when it is needed. This model of elderly accommodation is ideally suited for individuals, or indeed couples who wish to continue living together in a situation where one, or both, have care needs. This type of accommodation falls within the PPG's definitions of Specialist Housing for Older People and would be characterised as Extra care housing or housing-with-care.
- 1.4 ARL has a fantastic track record of delivering class leading developments, with recently completed schemes winning What House, Gold, Silver awards for the best retirement development in 2017, 2019 and 2020. Last year, our Heaton Mersey development, the Woodlands, won Senior Housing Scheme of the Year at the Health Investor Seniors Housing Awards. Our recent development in Sheffield, Jacobs Gate has proved hugely popular and demonstrated that there is a significant demand for specialist older peoples housing.
- 1.5 This representation comments upon:
- Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations.
 - Part 2: Development Management Policies and Implementation.
 - Annex A: Site Allocations.
 - Annex B: Parking Guidelines.
 - Glossary; and
 - Supporting Documents

¹ Planning Practice Guidance: Paragraph: 001 Reference ID: 63-001-20190626

2. Part 1: Vision, Spatial Strategy, Sub-Area Policies and Site Allocations

Chapter 3: Growth Plan and Spatial Strategy

Policy SP1 and SP2

- 2.1 The housing growth figures are set out in Policy SP1, and are said to reflect the capacity of the existing urban areas and the restrictions imposed by the Green Belt. The plan, in summary, makes the case for rejecting the 35% uplift for urban centres set out in the Standard Method for Local Housing Need, because it would result in a housing figure that outpaced anticipated jobs growth. At 2,090 dwellings per annum the plan is effectively proposing a shortfall of 15,061 dwellings over the plan period (2022 to 2039). This level of growth (it would appear) is a result of the Council's decision in January 2022 to reject green belt release unless the sites are "sustainably located".
- 2.2 The plan proposes circa 18,465 new homes over the plan period in the City Centre (Policy SA1), which is equivalent to just over 50% of the total proposed housing supply and 56% of the proposed housing allocations. The problem with this approach is that the City Centre delivered in 2020-2021 56% (996 dwellings) of the city's gross dwelling completions, but only 7 were 'houses'. There is no doubt that there will be a demand from a section of society for apartment/flatted living, but there large tranche of the population that are likely to want a family home (including those in need of affordable housing), with outdoor amenity space, access to a good choice of schools etc which the plan does not appear to have the flexibility in its proposed distribution of housing to be able to provide. This is clearly set out in Table 8.1 of the 2019 Sheffield and Rotherham SHMA:

Table 8.1: Summary of key evidence of demand

	Rotherham	Sheffield	SRHM
Overall housing requirement (annual units)	500-650	1,800-2,200	2,300-2,850
Stock profile ([current profile] / profile of new demand*)			
• One bed	[8%]	[12%]	Existing hhld 24% New hhld 27-33%
• Two bed	[25%]	[27%]	Existing hhld 41% New hhld 33-42%
• Three bed	[53%]	[45%]	Existing hhld 30% New hhld 20-21%
• Four+ bed	[14%]	[16%]	Existing hhld 6% New hhld 10-13%
Dwelling type profile ([current profile] / profile of new demand)			
• Flats/apartments	[11%] 11%	[25%] 20%	[21%] 18%
• Terraced	[23%] 11%	[29%] 18%	[27%] 16%
• Semi-detached	[45%] 37%	[32%] 35%	[36%] 35%
• Detached	[21%] 42%	[12%] 28%	[15%] 31%
Tenure profile ([current profile] / profile of new demand)			
• Owner-occupation (inc. LCHO)	[61%] 76%	[59%] 64%	[60%] 67%
• Social rented / affordable rent	[22%] 16%	[25%] 19%	[24%] 18%
• Private rented / other rent (inc. tied accommodation etc.)	[16%] 8%	[16%] 18%	[16%] 15%

Source: Household survey, 2018. *Notes: The profile of new demand by bedroom size is only available at SRHM level. Property size profile of new demand relates to expected need not preferences and is provided at the level of the SRHM as a whole for both existing households and new households. The balance between demand coming from existing and new households at a local level will need to be considered, as will constraints on households' ability to afford. Figures within this table are an indication of unconstrained preferences and should be taken as a guide only.

- 2.3 This table, demonstrates that there was a 'demand' in 2019 for 20% apartments/flats, with the remaining 80% for terraced, semi-detached and detached properties. It is appreciated that this study is a little dated, so demand may have shifted, but it does demonstrate that what the Council are looking to deliver (basically 50% apartments or more) is not what its local population wants or needs, and it does not therefore appear to be justified.
- 2.4 Policy SP2 sets out the Spatial Strategy which is to locate the majority of future growth on previously developed sites within existing urban areas. It is clear that there are locations in the City Centre where demand exists for high density apartment schemes (for example Kelham Island) but it is unclear if the demand exists in other parts of the City/whether than demand will come to fruition in this plan period². The case for additional family housing on greenfield/green belt land is clear and not adequately addressed in this plan. It is not considered that the Council have adequately justified (notwithstanding the Integrated Impact Assessment Report Dec 2022) the role that non-city centre, greenfield or even Green Belt sites could have in meeting the full extent of the City's housing needs (or a greater proportion of it), both in terms of the overall numbers and the range of house types.
- 2.5 The growth plan and spatial strategy make little reference to Sheffield's ageing population and the housing needs of this specific group – the plan is woefully inadequate in this regard and cannot be said to be positively prepared.

Chapter 4: Sheffield's Sub-Area Strategy

Policy SA1-SA9 (including CA1 to C6)

- 2.6 Chapter 4 contains a lot of information in terms of how the various character areas in the Central Sub-Area (Policy SA1) will deliver approximately 18,640 new homes (through a combination of existing planning permissions and new site allocations). The policy text to policy SA1, and not one of the allocations proposed in CA1 to C6, have a requirement to provide any specialist housing for older people. The housing needs of this growing section of the City's population are ignored and have not been considered for the purposes of the Central Sub-Area.
- 2.7 This issue is compounded by the fact that the same issue presents itself in the Northwest, Northeast, East, Southeast, South, Southwest Sheffield Sub-areas (Policy SA2-SA7) as well as in the Stocksbridge/Deepcar and Chapeltown/High Green Sub-Areas (policy SA8-SA9). This is perhaps best illustrated by the fact that the word elderly, older, specialist, retirement, extra care etc is not referenced once in this Chapter and not a single of the allocations specifically requires any form of specialist housing for older people to be provided³. The allocations in Annexe A also provide no specialist accommodation for the elderly/any reference. It is acknowledged that policy NC1, criteria c) promotes a range of house types on the Strategic Allocations which could include for the elderly, and some encouragement is provided in NC4, but, as set out below in Section 3 of this response, these provisions are generic and inadequate to meet the critical need for this form of accommodation. Not a single unit of specialist housing for older people is allocated in this plan.

² Several of the assumptions on the proposed allocation in the HELAA Sites Schedule 2022-23 appear overly optimistic

³ The PPG (Paragraph: 010 Reference ID: 63-010-20190626) provides a non-exhaustive list of the types of specialist housing for older people.

2.8 The online Planning Practice Guidance (PPG) sets out that: “Plans need to provide for specialist housing for older people where a need exists”⁴. The PPG however does state that it is up to the plan-making body to decide whether to specifically allocate sites⁵. It recognises the benefit of allocating sites in terms of providing greater certainty for developers and encouraging the provision of sites in suitable locations. It also states that: “this may be appropriate where there is an identified unmet need for specialist housing”.

2.9 The supporting evidence to the emerging plan makes clear that the older population is going to increase significantly. The Housing, Economic Growth and Demographic Modelling report (July 2021) at Table 3.5 and 3.6 demonstrates that between 2011 and 2019 the greatest increases in population was in older age groups – aged 65 or over. Table 5.2 & 5.3 confirms that the increases in the older person population are projected to be the most significant over the plan period regardless of which dpa is used:

Table 5.2 Population change 2021 to 2038 by broad age bands – Sheffield (linked to delivery of 2,923 dwellings per annum)

	Population 2021	Population 2038	Change in population	% change from 2021
Under 16	106,968	120,463	13,495	12.6%
16-64	393,523	449,947	56,424	14.3%
65 and over	95,962	122,881	26,919	28.1%
Total	596,454	693,291	96,838	16.2%

Source: Demographic Projections

Table 5.3 Population change 2021 to 2038 by broad age bands – Sheffield (linked to delivery of 2,131 dwellings per annum)

	Population 2021	Population 2038	Change in population	% change from 2021
Under 16	106,968	113,224	6,256	5.8%
16-64	393,523	424,751	31,228	7.9%
65 and over	95,962	121,604	25,642	26.7%
Total	596,454	659,579	63,126	10.6%

Source: Demographic Projections

2.10 Despite this striking increase, the regard given to specialist housing for older people in the plan and the supporting information is inadequate. The 2019 SHMA is dated, and its attempts to establish a need for older persons accommodation is done so on the basis of Household Survey data from 2018 (as per Table 7.10).

2.11 Paragraph 62 makes clear that the size, type and tenure of housing needed for older people and people with disabilities should be assessed and reflected in planning policies. The PPG provides further advice:

- What range of needs should be addressed⁶,
- The evidence that can be used when identifying the housing needs of older people⁷; and
- The different types of specialist housing for older people⁸

⁴ Paragraph: 012 Reference ID: 63-012-20190626

⁵ Paragraph: 013 Reference ID: 63-013-20190626

⁶ Paragraph: 003 Reference ID: 63-003-20190626

⁷ Paragraph: 004 Reference ID: 63-004-20190626

⁸ Paragraph: 010 Reference ID: 63-010-20190626

2.12 The PPG provides that *“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people”*. It is considered that the Council have heeded the guidance provided in the PPG in this regard.

2.13 The Local plan and associated evidence base have not considered the future need for specialist accommodation for older people by tenure and type. There is no sign of use of the suggested (albeit now dated) @SHOP tool or any other tool/assessment for that matter to establish what the need/current provision is and project forward what need will be at the end of the plan period for the different types of specialist accommodation for older people⁹. The plan is therefore clearly not in accordance with paragraph 62 of the NPPF.

2.14 Whilst dated, attention is drawn to Sheffield’s Older People’s Independent Living Housing Strategy (OPIL Housing Strategy) 2017-2022 which was approved by Cabinet on the 13 December 2017. This strategy is referenced in the definitions to policy NE4. The need identified in this strategy stemmed from research conducted by the University of Sheffield entitled Retirement Housing in Sheffield Supply and Demand to 2034. The Councils OPIL Housing Strategy said:

“Sheffield has a significant shortfall in its provision of specialist housing for older people. Modelling by the University of Sheffield found a shortfall of 2,430 units in 2015 and the Housing LIN’s SHOP@ online tool found an even greater shortfall of 4,511 units (larger than most comparator cities in the UK). Both models suggest this shortfall will have nearly doubled by 2034

Planned delivery of specialist OPIL housing by the public and private sectors will not meet future levels of need. The lack of specialist developers operating in the city is one factor, as is the uncertain financial and funding climate. It is important therefore to look at how we can help developers to overcome the barriers, including viability issues, they face and how we can increase supply through direct delivery and commissioning.

Focussing on meeting the housing needs and aspirations of older people is one of the most effective ways to meet the housing needs of adults of all ages. It does this directly by helping to release larger housing in all tenures, unblocking smaller homes further down the housing chain, but it can also free up capital and give some older homeowners the opportunity to help children and grandchildren to access their own homes if they so wish.

2.15 According to a Report presented to the Education, Health & Care Transitional Committee 3 March, 2022 – this OPIL Housing Strategy is going to be updated. Furthermore, the report notes that *“a Specialist Accommodation Assessment is currently being drafted by the Strategic Housing Service which identifies the scale of additional supported accommodation required in the city”*. The report notes the following:

- Between 2020 and 2040 the number of people aged 65 and over is expected to increase by around 27% and by 44% among people aged 85 and above. Sheffield’s older

⁹ Paragraph: 010 Reference ID: 63-010-20190626

population is also becoming increasingly diverse; people are now living longer with a range of health conditions.

- Sheffield has a relatively narrow OPIL housing offer which is dominated by social-rented sheltered schemes. There are around 2,800 OPIL properties in Sheffield, spread across more than 70 schemes. The majority (78%) of Sheffield’s OPIL housing is sheltered housing and is mainly provided by social landlords as rented accommodation (80%).
- Several projection models (details not included in the report – but shown below) identify Sheffield as having a large shortfall of this type of housing which will grow significantly in the future.
- A variety of specialist housing, age-friendly general needs housing and housing-related support is therefore required to sit alongside Extra Care housing to support independent living in later life.

Shortfalls in Sheffield's OPIL Housing Provision

6.2 Several projection models identify Sheffield as having a large shortfall of this type of housing which will grow significantly in the future.



2.16 Although not apparent from the emerging Local Plan material, it is clear that the Council understand that there is a significant need for specialist older persons housing. The Council however do not appear to know exactly what this need is, and it is not set out in any of the supporting information. The Council need to establish what the up-to-date need is and how this is going to be addressed in the Local Plan as the currently drafted general policies, discussed below, are not adequate. The plan is not positively prepared/effective in this regard.

3. Part 2: Development Management Policies and Implementation

Chapter 4: Thriving Neighbourhoods and communities

Policy NC1

3.1 Policy NC1 is the principles guiding the development of the Strategic Housing Sites (i.e., the largescale major housing sites which have a capacity of at least 200 homes or development of more than 4 hectares). Criteria c) places a requirement on applicants for the Strategic Housing Sites to “provide an appropriate range of housing types, tenures, sizes, densities, styles, and

values that reflect the needs and aspirations of the existing population and future residents, particularly families with young children, and older and disabled people”.

- 3.2 Our experience is that the generic approach of encouraging older persons/specialist housing on strategic sites is ineffective as a landowner/promoter/house builder would not be compelled to sell a parcel(s) of their site for that use and will instead revert to the default of C3 market housing as its easier and more familiar. Moreover this ‘generic approach’ fails to recognise there is not a homogenous type of specialist housing. Each has their own locational and size requirements. For example, a retirement/sheltered housing scheme might only require approx. 1.5 acres, whereas other operators require 8-12 acres to accommodate a commercially viable integrated retirement community providing a choice of apartments, bungalows, cottages as well as the considerable associated on-site communal facilities (i.e. café, restaurant, shop, hairdressers, activity space, pool, fitness studio, gym, treatment rooms, etc).
- 3.3 The policy provides no guidance on the percentage of older persons housing that should be achieved on the strategic sites or an overall target that the Council will aim for, making its success in this regard impossible to assess. As such, the policy is unlikely to be effective in encouraging the delivery of additional older persons accommodation and the Council should instead consider a target and/or allocating sites to meet the needs of the elderly as is encouraged in the PPG¹⁰.

Policy NC3

- 3.4 Policy NC3 sets out that affordable housing will be required on all housing developments of 10 or more dwellings, with the majority of areas at 10% with the more affluent areas, to the North West, South and Southwest of the City at 30%. It is noted that the definition of housing development is *“all types of housing falling in Use Classes C2 or C3 giving rise to new dwellings (it does not apply to institutional uses such as care homes). This includes specialist housing designated for older or disabled people”.*
- 3.5 As such, as drafted, any development of specialist housing for older people, regardless of Use class, with the exception of care or nursing homes, would be required to provide affordable housing. This is lacking any justification and appears perverse for the reasons set out below.
- 3.6 The planning justification for general C3 housing developments to provide affordable housing units is an obvious one. If there is an imbalance in the housing stock and a proposal comes forward which worsens that imbalance, then it should not be permitted unless it contributes to ensure that the imbalance is not materially worsened. As such, where market housing is proposed in an area with a shortfall of affordable housing, to grant permission for a proposal comprising exclusively of market housing would worsen that imbalance and provide a land use/planning justification for refusal. This justification does not exist in Sheffield and indeed the imbalance is the other way round – the Council’s Report presented to the Education, Health & Care Transitional Committee 3 March 2022 found that whilst there is a narrow offer, it is dominated by social-rented sheltered schemes.
- 3.7 Gladman Retirement Living under the Adlington brand provide Use Class C2 extra care/housing with care developments. The viability of these schemes is very different to standard C3 housing developments and indeed to the traditional sheltered housing schemes currently found in the

¹⁰ Paragraph: 013 Reference ID: 63-013-20190626

city. For example, build costs are significantly higher and circa 25% of the building is communal floorspace. The ongoing costs and set up costs of C2 accommodation are significantly greater than other C3 forms of accommodation. Sales profiles are vastly different – very few sales are off plan, occupancy can only occur once a development is complete (and generally sales are less than 2 units a month which does not appear to have been factored into the Plans Viability Assessment).

3.8 The Council’s Whole Plan Viability Assessment (November 2022) has considered/run appraisals for sheltered accommodation and extra care only (based on a very limited pool of comparator information), and has therefore failed to assess the full range of specialist housing for older people typologies from which it is seeking affordable housing.

3.9 Notwithstanding this, as well as mainstream housing, Sheltered and Extra care Housing are considered separately. Appraisals were run for a range of affordable housing requirements and the results are presented in Table 10.12 which is repeated below for ease of reference:

Table 10.12 Older People’s Housing, Appraisal Results (£/ha)					
		Affordable %	EUV	BLV	Residual Value
Site 1	Sheltered Green	0%	50,000	350,000	607,411
Site 2	Sheltered Green	5%	50,000	350,000	252,365
Site 3	Sheltered Green	10%	50,000	350,000	-77,001
Site 4	Sheltered Green	15%	50,000	350,000	-441,279
Site 5	Sheltered Green	20%	50,000	350,000	-770,645
Site 6	Sheltered Green	25%	50,000	350,000	-1,141,014
Site 7	Sheltered Green	30%	50,000	350,000	-1,476,285
Site 8	Sheltered Brown	0%	600,000	720,000	-684,307
Site 9	Sheltered Brown	5%	600,000	720,000	-1,015,583
Site 10	Sheltered Brown	10%	600,000	720,000	-1,387,282
Site 11	Sheltered Brown	15%	600,000	720,000	-1,766,729
Site 12	Sheltered Brown	20%	600,000	720,000	-2,093,181
Site 13	Sheltered Brown	25%	600,000	720,000	-2,479,341
Site 14	Sheltered Brown	30%	600,000	720,000	-2,813,201
Site 15	Extracare Green	0%	50,000	350,000	-38,777
Site 16	Extracare Green	5%	50,000	350,000	-444,636
Site 17	Extracare Green	10%	50,000	350,000	-850,496
Site 18	Extracare Green	15%	50,000	350,000	-1,290,952
Site 19	Extracare Green	20%	50,000	350,000	-1,703,984
Site 20	Extracare Green	25%	50,000	350,000	-2,117,016
Site 21	Extracare Green	30%	50,000	350,000	-2,532,627
Site 22	Extracare Brown	0%	600,000	720,000	-1,664,315
Site 23	Extracare Brown	5%	600,000	720,000	-2,077,347
Site 24	Extracare Brown	10%	600,000	720,000	-2,490,379
Site 25	Extracare Brown	15%	600,000	720,000	-2,935,905
Site 26	Extracare Brown	20%	600,000	720,000	-3,357,996
Site 27	Extracare Brown	25%	600,000	720,000	-3,780,087
Site 28	Extracare Brown	30%	600,000	720,000	-4,202,178

Source: HDH (September 2022)

3.10 It is therefore unsurprising that the Council’s viability assessment states the following:

10.87.....Based on the above analysis, there is limited scope for Sheltered or Extracare Housing to bear affordable housing. **It is recommended that this type of development is not subject to affordable housing (page 189)**

- 3.11 As set out in paragraph 2.14 above, the Council stated the importance of helping developers of specialist older persons housing to overcome barriers to delivery, including viability issues to ensure that more of this much needed accommodation is built. It is therefore surprising that the emerging local plan has sought to further undermine the viability of specialist older persons housing, including on developments falling into Use Class C2, by requiring them to provide affordable housing. The bottom line is that across Sheffield, specialist developers of elderly accommodation will not be able to compete for land if required to provide affordable housing. Ultimately, this will further frustrate the delivery of this much needed form of accommodation.
- 3.12 In recent years there has been some growth in terms of the amount of extra care/housing with care developments provided nationally, and indeed, our development at Jacobs Gate, Sheffield is one such example. Despite the success of this scheme, if 10%/30% affordable housing had been required, it would have been unviable, and we would not have taken this forward. On previous C2 extra care/housing with care developments, which the whole plan viability assessment clearly demonstrates is very different to standard C3 housing, there has been no requirement in Sheffield to provide affordable housing. The previous versions of the Local Plan did not have this requirement. It is unclear what the reasoning is for this now being sought and it does not appear to be justified.

Policy NC4

- 3.13 Policy NC4 concerns Housing for Independent and Supported Living. The comments on this policy are confined to the '*Specialist housing designated for older or disabled people*' element. The policy sets that Specialist housing designated for older or disabled people will be promoted in areas of need. It is usual that a policy for specialist housing for older people includes a requirement to demonstrate there is an identified need, however, according to the definitions of the policy, this area of need is as set out in the Older Persons and Independent Living Strategy. As set out above, the Council's current strategy is dated and is not included in the supporting information for this plan for scrutiny/comment.
- 3.14 Whilst this evidence would be helpful as a starting point, there is no standard methodology in assessing needs. There are several different tool kits. Proposals coming forward would normally be accompanied with a needs assessment for that development, using an established methodology. It must be open to a developer to demonstrate need through such an assessment to satisfy the policy rather than reliance simply on the Council's strategy which is not the subject of any testing/examination. As such, whilst the requirement to demonstrate a need is accepted, the policy should be amended to be effective.
- 3.15 Proposals will be deemed to be acceptable where local health facilities would have sufficient capacity to cater for additional needs arising from the development; and the accommodation would be close to essential services, particularly public transport, shops, and health services. The definitions section states '*Close to local facilities*' usually means less than 400m dependent on the mobility of the intended residents. The text in the policy states that proposal would be acceptable where '*the accommodation would be close to essential services*'. Whereas the definitions states '*close to local facilities*' – it is assumed that either the definition wording or that in the policy needs to change so that they match for the avoidance of doubt/confusion. It is

also unclear what other services would be deemed to be essential other than public transport, shops and health services.

- 3.16 Requiring Specialist housing designated for older or disabled people to be within 400m of public transport, shops and health services will severely limit the delivery of this form of accommodation - as this will make vast swathes of the city unsuitable for specialist housing. In our experience, it is rare for sites in established residential areas, to be within 400m of public transport, as well as shops and health services (you are more likely to get a mix of the 3). This requirement also fails to appreciate the differences between age-restricted housing, sheltered housing, extra care housing or housing with care and residential care homes and nursing homes. In developments with 24 hour staff on site and care provided, why would you need to be within 400m of health services. Similarly, if a site has fantastic public transport connections, within 400m, but a shop is 750m away, then notionally a development would not accord with this policy despite its apparent locational sustainability. It is also pertinent to note that many extra care schemes/integrated retirement communities have significant communal facilities on-site meaning that day-to-day needs for local services and facilities are less. This requirement needs to be deleted/amended as it is unnecessarily proscriptive.
- 3.17 The policy as currently drafted is very generic and provides limited support for specialist older persons housing. Our experience, and that borne out by dealing with applications for this form of accommodation day in and day out, is that the generic approach of a passive encouragement is not sufficient to get more older persons housing built.
- 3.18 A broad suite of Government policy highlights the importance to be attached to providing suitable housing for the elderly. In particular, the PPG states the *“need to provide housing for older people is critical”*, this is attaching a level of weight not given to other housing, and further states the advantages of *“offering older people a better choice of accommodation”*¹¹.
- 3.19 The PPG also adds that *“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people”* and that *“these policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require”* further adding that emerging Plans can provide indicative figures, or for a range for the number of units needed across the area throughout the plan period¹².
- 3.20 Policy NC4 as presently worded fails to properly address the particular needs of older people, nor does it deal with the types of housing required. Further, it does not set out an indicative figure or a range as encouraged in guidance and this undermines the objectives of properly providing for the elderly. This provides no confidence to developers/operators of specialist housing for older people.
- 3.21 The policy as worded is ‘generic’ and lacks the level of detail and precision sought in policy guidance. This was a particular issue which arose with the South Oxfordshire Local Plan (SOLP), leading a planning inspector, in the recent Sonning Common appeal¹³ for an extra-care scheme (ref: 3265861, dated 25 June 2021), to conclude: *“Policy H13 in the SOLP expressly deals with specialist housing for older people. It covers all forms of specialist housing for older people, but it is completely generic as to its provision. **No attempt is made to differentiate between different***

¹¹ PPG: Paragraph 001 Reference ID: 63-001-20190626

¹² PPG: Paragraph: 006 Reference ID: 63-006-20190626

¹³ APP/Q3115/W/20/3265861 - Little Sparrows, Sonning Common, Oxfordshire RG4 9NY – June 2021

types and tenures of specialist housing for older people, nor to address the need for each. The needs of all older people are simply lumped together. Nor is there any engagement with the market constraints and viability considerations relating to specialist accommodation for older people".

3.22 The Sheffield Plan has the same flaws as identified by the Inspector in South Oxfordshire, as it fails to explain how it intends to meet the needs of older people over the plan period (or for that matter what the need actually is). It fails to properly distinguish between the different typologies of elderly housing to provide for choice, and the policy is not effective because it has no mechanism to ensure all typologies are met over the plan period. The policy is not positively prepared, justified or effective.

4. Annex B: Parking Guidelines

Parking for Specialist Accommodation for the Elderly

4.1 Annex B is silent on the parking requirements for specialist accommodation for the elderly (other than parking provision for Care Homes/secure accommodation. It is appreciated that on page 3 of the document it notes that *"Parking provision for developments not included in the Parking Guidelines table, or developments within the Green Belt, will be considered individually, taking account of the location, accessibility, existing highway conditions, and individual circumstances in each case"*. This approach is supported.