

11 March 2024

Knowsley Metropolitan Borough Council
Planning and Building Control
Municipal Buildings
20 Archway Road
Huyton
L36 9UX

Dear Sir/Madam

RE: St Helena's Residential Care Home, 6 Roby Road, Huyton – Proposed Alterations and Refurbishment of Existing Care Home to Create 16 Specialised Supported Housing Apartments

This covering letter accompanies a full planning application by Jagger, Jones & Muzzlewhite ('JJM') for alterations and refurbishment works to the existing St Helena's Residential Care Home on Roby Road in Huyton to provide 16 high-quality Specialised Supported Housing (SSH) apartments together with ancillary staff areas for adults with a range of disabilities.

Stantec has successfully advised on a vast number of similar SSH schemes across the country, for a wide range of specialist development and investment companies which work in partnership with local authorities, registered social housing providers, care commissioning bodies, national charities and support providers. As a result of our extensive experience in this sector, we have a very thorough and robust understanding of the planning considerations associated with this form of specialised accommodation.

This letter summarises the development proposal and explains how the scheme is in conformity with the relevant provisions of the adopted development plan, national planning guidance and other material considerations. This letter should be read alongside the submitted Design & Access Statement and suite of plans produced by Den Architecture.

The Application Site and Description of Development

The application site comprises the existing St. Helena's Residential Care Home building and adjacent car park and gardens/landscaped areas. The site is located in a highly sustainable location within the urban area of Huyton, close to bus and train services and a wide range of local shops and other facilities.

We understand that the property has been previously registered to provide accommodation and personal care to up to 33 individuals, and has more recently provided a supported living pathway for up to 25 people experiencing various support needs. However, the present layout of the building is extremely restrictive and only allows for the provision of shared accommodation which does not adequately meet the needs of those individuals within the Knowsley area requiring supported living services as part of their journey towards independence.

Accordingly, the application scheme proposes alterations to the physical layout of the property to deliver 16 self-contained specialised supported living apartments for those at various stages of their transition towards independent living, with some ancillary communal space available for training, group work,

meetings and social events. A separate ancillary 'pod' within the car park, to replace the existing portable building on site, will provide an area for staff and some additional private meetings.

Accordingly, the proposed works include the following key elements:

- Internal reconfiguration and refurbishment of the existing building to create 16 self-contained one-bedroom SSH apartments (Use Class C3(b)), together with ancillary staff areas.
- Replacement of the existing portacabin in the car park with a new small prefabricated office pod.
- Demolition of the existing conservatory extension and replacement with new external patio area.
- Provision of a cycle store in car park.
- Installation of a new roof light at the rear of the existing building, and new solar panels on the roof.
- All existing timber windows are to be refurbished or replaced with those of a similar appearance.
- Replacement of front door in the same position, and a door to the rear to be replaced with a window.
- General upgrade works to the communal gardens/landscaped areas.

How the Scheme will be Managed and Operated

On-site support will be delivered by Northern Healthcare and housing management will be provided by Encircle Housing. Northern Healthcare is experienced in delivering community living-based support services to adults with disabilities, and provide personalised enablement support that assists individuals to move on to full independence. Encircle Housing is a specialist housing association providing homes for people with various forms of learning and physical disabilities and sensory impairments. They help people to find the right housing and environment that meets with their specific needs and work in partnership with care providers to ensure a person can access support to live independently. Encircle Housing partner with local authorities, funders and investors across the country to develop new tailored housing opportunities for people.

The scheme is being delivered with the full support of Knowsley Council's Whole Life Commissioning Team (see enclosed letter from Steve Baker – Commissioning and Contract Officer), who have already identified the intended occupants with various forms of disability, and provisionally agreed the rent levels with Knowsley Council's Housing Benefit Department.

The Council has confirmed that the proposed scheme with on-site support from Northern Healthcare and housing management from Encircle Housing would work well and deliver positive outcomes for individuals, including increasing independent living skills, and an enhanced positive experience of care and a reduction in the need for paid support where appropriate.

The Council has also confirmed that this new provision would be designed and designated to meet an identified specialist housing need in the borough, and for individuals for whom the alternative in many cases could be more expensive and unnecessarily restrictive settings, including potentially care homes. There is therefore a very clear and acute confirmed need for this form of specialist accommodation in this location, and the proposal is not dissimilar from the previous care home use at this site, albeit the

proposed SSH scheme will be at a much lower density and will allow for a greater level of independent living within a supported community setting.

What is Specialised Supported Housing

SSH is defined within the Government's 'Policy statement on rents for social housing' (published 2020, last updated December 2022) as supported housing:

- a) which is designed, structurally altered, refurbished or designated for occupation by, and made available to, residents who require specialised services or support in order to enable them to live, or to adjust to living, independently within the community;
- b) which offers a high level of support, which approximates to the services or support which would be provided in a care home, for residents for whom the only acceptable alternative would be a care home;
- c) which is provided by a private registered provider under an agreement or arrangement with a local authority or a health service (within the meaning of the National Health Service Act 2006);
- d) for which the rent charged, or to be charged, complies with the agreement or arrangement mentioned in paragraph (c); and
- e) in respect of which at least one of the following conditions is satisfied:
 - i. there was no, or negligible, public assistance, or
 - ii. there was public assistance by means of a loan (secured by means of a charge or a mortgage against a property).

SSH is typically provided by registered providers of social housing. Most non-profit registered providers (RPs) are also known as housing associations. SSH is a sub-category of supported housing that is exempt from usual social rent setting requirements as set out in the Rent Standard (these are requirements for registered providers in England in relation to social rent setting) and the Government's Policy statement on rents for social housing.

Supported housing is a service designed to help people with a wide range of support needs retain their independence by being supported in their own home. People in supported housing have their own tenancy and are responsible for their cost of living. To afford these, the person may be entitled to a wide range of benefits and grants.

Tenants living in supported housing commonly have their Housing Benefit claims assessed under 'Specified Accommodation' regulations. 'Specified accommodation' is a term used in Housing Benefit and Universal Credit to describe supported accommodation where some of the rules that normally limit the amount of rent covered by a housing benefit award do not apply.

Supported living accommodation enables vulnerable adults to lead as normal and as independent a life as possible. Due to their disabilities, however, they find themselves unable to do so without a certain amount of support, the level of which varies according to an individual's needs. The overall aim of SSH is to increase each person's independence over time, for example by reducing the amount of support needed, trying new things or moving to more mainstream accommodation.

SSH typically falls within Use Class C3, or more specifically C3(b) which the Town and Country Planning (Use Classes) Order (as amended) defines as covering up to six people living together as a single household and receiving care (e.g. supported housing schemes such as those for people with learning disabilities or mental health problems). Each apartment is a separate unit of self-contained

accommodation with one occupant living as a single household (i.e. less than the control threshold of six residents). Furthermore, supported living requires the Registered Provider to be able to grant an Assured Tenancy, which is only possible under Use Class C3.

Planning Policy Considerations

National Planning Policy Framework

The latest version of the National Planning Policy Framework (NPPF) was published in December 2023. Paragraph 7 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, which can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Paragraph 11 makes clear that at the heart of the NPPF there is a presumption in favour of sustainable development, which is running through both plan-making and decision-taking. This means: (i) local planning authorities should positively seek opportunities to meet the development needs of their area; (ii) Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change; (iii) approving development proposals that accord with the development plan without delay; and (iv) where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

Paragraph 60 of the NPPF advises that, in order to significantly boost the supply of housing, it is important that a sufficient amount and variety of land can come forward where it is needed, and that the needs of groups with specific housing requirements are addressed. Further to this, paragraph 61 of the NPPF outlines how local planning authorities should determine the minimum number of houses needed by conducting a housing needs assessment using the standard methodology.

Paragraph 63 outlines how local planning authorities should plan for the needs of different groups in the community (such as older people and people with disabilities), and identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

Planning Practice Guidance

The Government launched the online Planning resource on 6 March 2014. The guidance aims to assist councils and developers to translate the aims and aspirations of the NPPF into practice. The PPG re-emphasises the importance of the development of brownfield land, and the need to maintain an appropriate supply of housing land which meets local needs in full.

In June 2019 the Government published a new section of the PPG called 'Housing for older and disabled people'. The PPG states that the provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping people to live safe and independent lives and that, without accessible and adaptable housing, disabled people risk facing discrimination and disadvantage in housing.

The PPG also states how it is better to build accessible housing from the outset rather than having to make adaptations at a later stage – both in terms of cost and with regard to people being able to remain safe and independent in their own homes. Government guidance therefore places a firm emphasis on the need to deliver this specific form of accommodation.

Knowsley Local Plan Core Strategy

The Knowsley Local Plan Core Strategy was adopted in January 2016. Of particular relevance to this application is Policy CS16 ('Specialist and Supported Accommodation') which states that to meet the

needs of households requiring specialist housing or supported accommodation, the Council will work with partners to make better use of the current housing stock through improvements to its quality, remodelling or replacing existing accommodation to meet changing needs, and support the provision of new specialist and supported residential accommodation which is located in an appropriate environment, near to highways and public transport links and local amenities; feature ease of access for those with mobility, physical or sensory disabilities; facilitate opportunities to align residential facilities with health and social care services; and is well-designed and attractive in compliance with Policy CS19 ('Design Quality and Accessibility in New Development'). The scheme is therefore precisely the type of accommodation that is supported in Policy CS16.

Conclusion

The application proposal involves alterations to and the reconfiguration of an existing care home to provide 16 self-contained one-bedroom SSH apartments, together with ancillary staff areas and external works including a pod to replace the existing building in the car park. The scheme has the full support of Knowsley Council's Whole Life Commissioning Team, which has identified an acute need for this form of specialist accommodation in the area. The scheme involves the re-use and re-occupation of an existing building in a highly sustainable urban location, and represents a form of development and accommodation that is firmly supported and encouraged in both national planning guidance and the local development plan. The majority of the proposed works are internal and do not give rise to any material planning considerations, and the external works are minor and incidental to the refurbishment of the property. The site was previously used as a care home and the proposed SSH use will be less intensive and is entirely in-keeping with the surrounding area.

We therefore consider that the application is in full conformity with the development plan and all relevant material considerations, and should be approved.

Yours sincerely,

Michael Gilbert
Senior Associate Planner

For and on behalf of
STANTEC UK LIMITED

Enc: Letter of support from Steve Baker, Commissioning and Contract Officer, Knowsley Council
Whole Life Commissioning Team