



DEVELOPMENT AND SITE ALLOCATIONS LOCAL PLAN

PROPOSED SUBMISSION

ACCESSIBLE AND ADAPTABLE HOUSING

BACKGROUND PAPER

September 2018

This information can be available in large print, Braille, audiotape/CD or in another language upon request.

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1.0 Why is a policy needed?

- 1.1 This background paper has been developed with regard to the Government's new 'Optional Technical Standards' and seeks to assess the need to implement these optional standards within Rother through the Development and Site Allocations (DaSA) Local Plan and the impact on the viability of development within the District. It consists of a desktop review of existing evidence and research relating to housing standards, and an analysis of the impact of population projections on the need to introduce the optional **access** requirements known as M4(2) and M4(3) within the Building Regulations – Part M - Access¹.

2.0 National policy position

- 2.1 On 25 March 2015 the Government set out in a Written Ministerial Statement² the introduction of new technical housing standards in England and detailed how these would be applied through planning policy. The new system comprises of new 'optional' Building Regulations on water and access, and a nationally described space standard (referred to collectively as "the new national technical standards"). The statement should be taken into account in applying the National Planning Policy Framework (NPPF), and in particular the policies on local standards or requirements, in both plan making and decision-taking.
- 2.2 The aim of these new national standards is to reduce the administrative burden on new housing developments by simplifying and rationalising the variety of differing standards that apply in different local authorities across England to new dwellings.
- 2.3 Through the Deregulation Bill, which was given Royal Assent on 26 March 2015, the Government made amendments to the Building Act 1984 to enable building regulations to set 'optional requirements' in relation to access and water above the basic minimum set out in the Building Regulations 2010.
- 2.4 In terms of access, the Government has introduced a three tier standard for accessibility in Part M (access to and use of buildings) of Schedule 1 of the Building Regulations – mandatory baseline i.e. minimum requirements and two optional standards:
1. Mandatory baseline - M4(1) – visitable dwellings; and
 2. Optional Standard - M4(2) – accessible and adaptable dwellings; and
 3. Optional Standard - M4(3) – wheelchair user dwellings.

¹ [Approved Document M: access to and use of buildings, volume 1: dwellings](#)

² Steps the government are taking to streamline the planning system, protect the environment, support economic growth and assist locally-led decision-making.-
<https://www.gov.uk/government/speeches/planning-update-march-2015>

2.5 These changes enable the new standards to be enforced through Building Regulations with the optional requirements to be applied within local authorities through planning policy in Local Plans and required in developments by way of conditions attached to planning consents.

Figure 1. Main differences between Part M 'Building Regulations' M4(2) and M4(3).

M4(2) Accessible and adaptable dwellings	M4(3) Wheelchair adaptable dwellings
<p>In addition to all the baseline requirements (M4(1)), dwellings built to M4(2) must comply with the following:</p> <ul style="list-style-type: none"> • All occupants must be able to approach bin stores. • Drainage for all paved areas must be installed with suitable falls to ensure there is no standing water. • Access to upper floor flats should be available by lift. • Dwellings should have provision for a future stair lift. • Principal living areas are to have low level windows no more than 850mm from floor level. • Bedrooms must have minimum direct route to the window at least 750mm wide. • Walls must be adapted to allow for future grab rails in bathrooms/stairwells. • Drainage must be provided for future level access shower room on the ground floor. • Ground floor level window handle locks must be between 850mm-1200mm from floor level. 	<p>In addition to all the M4(2) requirements, dwellings built to M4(3) must also comply with the following:</p> <ul style="list-style-type: none"> • Scooter/wheelchair storage must be provided. • Where there is a rise across the development over 300mm a stepped approach must be also be provided along with a ramp. Ramps must have a gradient of no more than 1:15. • Communal entrances – power assisted doors should be provided in certain circumstances. (Provisions for the future powered doors must be installed to private principal entrances). • Bedrooms must have minimum direct route to the window at least 1,000mm wide. • Provisions for through-floor lift must be provided. • Stairs are to be installed in accordance with the guidance followed for ambulant person's stairs. • Living spaces including bedrooms have a minimum size, plus there is detailed guidance for kitchen worktop length and location of fittings (these vary depending on the number of persons per dwelling). • All bedroom ceilings must be capable of taking a load of 200kg for a possible future hoist. • Door entry systems required at principal entrance with answering systems in the main bedroom and in the lounge.

2.6 Part M4(3) of the Building Regulations distinguishes between (3a) wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) and (3b) wheelchair accessible (a home readily useable by a wheelchair user, including step-free access) dwellings. Local Plan policies for wheelchair accessible homes (M4(3)(b)) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

3.0 National Planning Policy Framework

- 3.1 In assessing the need for the proposed optional housing standards, authorities must be able to satisfy the statutory requirements of the National Planning Policy Framework (NPPF). The NPPF requires that policies should be supported by up-to-date and relevant evidence to justify their inclusion within the Local Plan.
- 3.2 Specifically in relation to planning for housing within the District over the lifetime of the Plan, the NPPF is clear that Councils should plan for different groups in the community including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes.

4.0 Planning Practice Guidance

- 4.1 The Planning Practice Guidance (PPG) includes details on the application of the Optional Technical Standards and highlights the need for local planning authorities to gather evidence to determine whether there is a need for additional standards in their area, and justify setting policies in their Local Plans, including how the viability of setting these optional standards should be considered. The PPG states that:

“Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.”

- 4.2 And that:

“Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment.”

Optional Access Standards

- 4.3 In terms of the Access Standards and in respect of the evidence, the PPG³ states that:

“Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:

³ Paragraphs: 007 - 011 Reference IDs: 56-007-20150327 – 56-011-20150327)

- *the likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *the accessibility and adaptability of existing housing stock.*
- *how needs vary across different housing tenures.*
- *the overall impact on viability.*

To assist local planning authorities in appraising this data the Government has produced a summary data sheet⁴. This sets out in one place useful data and sources of further information which planning authorities can draw from to inform their assessments. It will reduce the time needed for undertaking the assessment and thereby avoid replicating some elements of the work.

Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. There may be rare instances where an individual's needs are not met by the wheelchair accessible optional requirement.

Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied.

Part M of the Building Regulations sets a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

The Building Regulations for accessible and adaptable or wheelchair user dwellings require that these types of dwelling should achieve step-free access. In setting policies requiring M4(2) and M4(3) compliant dwellings, local planning authorities will need to assess whether this has an impact on non-lift serviced multi-storey development in their local housing mix. Where step-free access in this type of development is not viable, neither of the Optional Requirements in Part M should be applied.

Where there is a very specific and clearly evidenced accessibility need, which is outside of what is provided for by the wheelchair accessible standard, a local planning authority can have different requirements in order to meet that need. This should only be required to meet the needs of a specific individual and therefore should only be required of a home where a local authority allocation policy applies. Such a requirement would also be subject to viability considerations”.

5.0 Existing Local Plan - Core Strategy objectives and policies

5.1 The Core Strategy contains a number of policies and objectives which it is considered support the adoption of the optional technical housing standards in respect of access. These include:

Policy OSS4: General Development Considerations

5.2 In addition to considerations set out by other policies, all development should meet the following criteria:

- (i) It meets the needs of future occupiers, including providing appropriate amenities and the provision of appropriate means of access for disabled users;

Policy BX1: Overall Strategy for Bexhill

5.3 The overall strategy to deliver the objectives for Bexhill is to:

- (ix) Provide for employment and housing growth, in accordance with Policy BX3, with particular regard to the needs of families, affordable housing for younger people and a range of supported housing options for older households.

Policy CO5: Supporting Older People

5.4 Initiatives and developments will be supported which:

- (i) Enables older people to live independently in their own home;
- (ii) Increases the range of available housing options with care and support services in accessible locations;
- (iii) Promotes active lifestyles;
- (iv) Increases older people’s engagement in community life, including through “hubs”.

Local Housing Needs Objectives:

- i) To provide and maintain a housing stock that supports sustainable, inclusive, communities in both towns and rural areas;
- ii) To respond to the changing mix and needs of households, including more older person households;
- iii) To increase the availability of affordable housing;
- iv) To provide housing choices that encourage young people to live locally;
- v) To make effective use of existing housing stock, including bringing empty homes back into use.

Policy LHN1: Achieving Mixed and Balanced Communities

- 5.5 In order to support mixed, balanced and sustainable communities, housing developments should:
- (i) Be of a size, type and mix which will reflect both current and projected housing needs within the district and locally;
 - (ii) In rural areas, provide a mix of housing sizes and types, with at least 30% one and two bedroom dwellings (being mostly 2 bed);
 - (iii) In Bexhill, contribute to increased provision of family dwellings, unless site circumstances make this inappropriate;
 - (iv) In larger developments (6+ units), provide housing for a range of differing household types;
 - (v) In relation to affordable housing, contribute to an overall balance of 65% social/affordable rented and 35% intermediate affordable housing;
 - (vi) Ensure that affordable housing is integrated with market housing, where practical;
 - (vii) Provide a proportion of homes to Lifetime Homes Standard.

Rural Areas Objectives:

- 5.6 To be demographically balanced and socially inclusive, particularly in terms of access to housing;

Communities Objectives:.....

- iii) To support older people, particularly to live independently.....

6.0 Current practice

- 6.1 There are no current standards adopted though existing local plan policy which relate to access standards or increased accessibility as part of new developments within Rother. However, the Council's housing department do request that in areas where there is an identified need through applicants on the housing register, then 10% of affordable housing to be provided on site should be built to the Rother Affordable Housing Wheelchair Site Brief⁵. The Brief sets out the requirements for wheelchair ready property comparable to that of the M4(3)(b).

⁵ https://www.rother.gov.uk/media/pdf/i/k/Affordable_Housing_Wheelchair_Site_Brief.pdf

7.0 Options and Preferred Options DaSA

7.1 The DaSA Options and Preferred Options set out a number of options below:

Access Standards policy options:

- A. Apply universal new policy that requires all residential development across the District to be built to M4 (2) standard** contained within the Building Regulations;
- B. Apply new policy requiring 25% of residential development on sites of 11+ dwellings to be constructed to enhanced access standards M4 (2)** contained within the Building Regulations
- C. Apply new policy requiring 25% of residential development on sites of 11+ dwellings to be constructed to enhanced access standards M4 (2), with an additional 5% being built to M4 (3) (b)** contained within the Building Regulations;
- D. No policy relating to enhanced access standards.** All development to be built to M4 (1) standard (baseline) contained within the Building Regulations.

7.1 The DaSA – Options and Preferred Options tentatively put forward ‘option c’ as the preferred option, although qualified this, indicating that wider inputs were required in terms of need and effectiveness.

8.0 Existing evidence studies/other information

8.1 The PPG provides a link to a data sheet – “Guide to Disability Data” which provides sources of information that Local Authorities can draw upon to inform their assessments. The information presented below, which relates to Rother District, is based on these sources.

Figure 2: Data set as set out in PPG

Evidence Source	Indicator	Data
Local Authority Housing Statistics	Numbers of households that are on the housing waiting list that have had to move on medical grounds or welfare grounds, including	85 applicants on the housing register who have been awarded medical priority on health or quality of grounds (August 2018) (Source: 2016-17 Local Authority Housing Data). <u>Number of housing register applicants who have mobility needs (August 2018):</u> Mobility 1 – 19 ⁶ Mobility 2 – 22 ⁷ Mobility 3 – 168 ⁸

⁶ Full time wheelchair users – indoor and outdoors

⁷ Applicants who cannot manage steps or steep gradients and use a wheelchair or outdoor mobility

⁸ Applicants who are able to manage two or three steps or stairs but unable to manage steep gradients

	<p>grounds relating to disability</p> <p>Levels of local authority housing stock.</p>	<p>21 Social Rent households left their last settled home due to it being unsuitable for ill health and disability reasons. 4 Affordable Rent households left their last settled home due to it being unsuitable for ill health and disability reasons. (Source: 2016-17 CORE Report).</p> <p>There is no local authority owned housing stock within Rother. However, there are 4,370 units of social housing stock in Rother in 2017 (Source: East Sussex in Figures)</p>
Continuous Recordings (CORE)	Data on social housing statistics	<p>2016-17 Lettings – CORE Report:</p> <p>General Needs Social Rent Lets – 131 General Needs Affordable Rent Lets – 71 Supported Housing Social Rent – Lets 159 Supported Housing Affordable Rent Lets – 12 TOTAL Lets – 373</p> <p><u>Social Rent</u> Requires fully wheelchair accessible housing – 4 Requires level access housing – 10 Other disability related requirements – 19 <i>72 units are fitted with aids or adaptations. 1 designed to accessible general standard. 1 designed to wheelchair user standard.</i></p> <p><u>Affordable Rent</u> Requires fully wheelchair accessible housing – 0 Requires level access housing – 3 Other disability related requirements – 8 <i>12 units are fitted with aids or adaptations. 0 designed to accessible general standard. 0 designed to wheelchair user standard.</i></p> <p>The Core Report can be accessed using the following link: https://core.communities.gov.uk/public/reports/6aed4cf3cb296f2f14db27e0bbf9eeaaf7fdf745/CORE-AR-GN/E07000064.pdf</p>
Personal Independence Payments	Numbers claiming personal independence payments (PIP)	<p><u>Disability Living Allowance (DLA) and PIP claimants</u> 5,203 (November 2016) 5,197 (November 2017)</p>
Labour Force Survey	Data on workforce characteristics including whether people are	<p>Population aged 16-64: 53.4% (50,700) [2017]</p> <p>75.1% (39,800 of Rother's 16 - 64 population are economically active. [2017-18] 24.9% (11,800) of Rother's 16 - 64 population are not economically active. [2017-18]</p>

	sick or disabled, and the kind of disability benefit claimed	4.4% (1,800) Unemployed [2017-18] Universal Credit claimant count is 1,190 [September 2018]				
Census	Self-reported information on long term health problems and disabilities	Residents with limiting long-term illness		Number	%	
		People with long-term health problem or disability ↕		21,242	23.4%	
		Day-to-day activities limited a little		11,591	12.8%	
		Day-to-day activities limited a lot		9,651	10.7%	
		People without long-term health problem or disability		69,346	76.6%	
		All People		90,588	100%	
Source: 2011 Census						
Population Estimates	Population estimates, including breakdown by age cohort	2017 mid-year estimates		Number	% of total population	
		65+		21,284	22.4%	
		80+		8,814	9.3%	
		Total Population		94,997	100%	
Source: 2017 mid-year population estimates						
Household Projections	Household projections based on population estimates, including breakdown by age cohort.	ESCC Projections April 2018				
			No of Households			
		Age group	2017	2028	2017-2028 change	% change
		15-24	730	740	10	1.4%
		25-34	2995	2713	-282	-9.4%
		35-44	4489	5171	682	15.2%
		45-54	7300	6013	-1287	-17.6%
		55-59	3988	4164	176	4.4%
		60-64	4017	5047	1030	25.6%
		65-74	9819	9972	153	1.6%
		75-84	6683	9684	3001	44.9%
		85+	3190	3972	782	24.5%
		Total	43210	47476	4266	9.8%
Source: Household projections by type and age (dwelling-led), 2017-2028.						

8.2 In addition to the suggested evidence sources in the Government's data sheet consideration has also been given to a number of other sources to help ascertain the level of future need for accessible and adaptable homes. Data used from POPPI (Projecting older people population information) and PANSI (Projecting adult needs and service information) also help to consider the wider picture.

	No. of people in Rother District	
POPPI Data	2017	2030
Mobility ⁹	5,731	7,827
Long Term Illness (a little) ¹⁰	7,441	9,953
Long Term Illness (a lot)	5,662	7,752
Over 75's living alone	7,042	10,306

	No. of people in Rother District	
PANSI Data	2017	2030
Moderate Physical Disability	4,303	4,339
Serious Physical Disability	1,361	1,400

8.3 The 2011 Census shows that over 23% of the population in the District have a long term limiting illness or health issue. This is considerable higher than the average for England which equates to 18%.

8.4 In 2028, households containing a head of household over 65 are predicted to equate to 50% of the households within Rother, up from 45% in 2017. These proportions equate to an extra 6,185 over 65s in 2028. The increase in the older population will inevitably lead to a greater need for suitable housing that can be adapted to allow people to stay in their own homes for longer.

8.5 Household projections based on the 2017 population projections show a large projected increase in older households over the plan period. The number of households where the representative is aged 60+ is set to increase considerably, and the number of households where the representative is 75+ is forecast to increase by more than a third.

8.6 The POPPI data projects a significant increase in the number of over 75s living alone by 2030, by 46% from 2017 figures. It also forecasts large increases in the number of people with limited mobility and limiting long term illnesses. This suggests there will be an increased need for suitable homes that can be adapted to meet their inhabitants' changing requirements.

8.7 The percentage of older people (65+) in Rother is one of the highest nationally and is projected to increase to 36% by 2028. The high number of older people who already live in the District has created demand for a range of housing options in addition to residential and nursing care but it is envisaged that

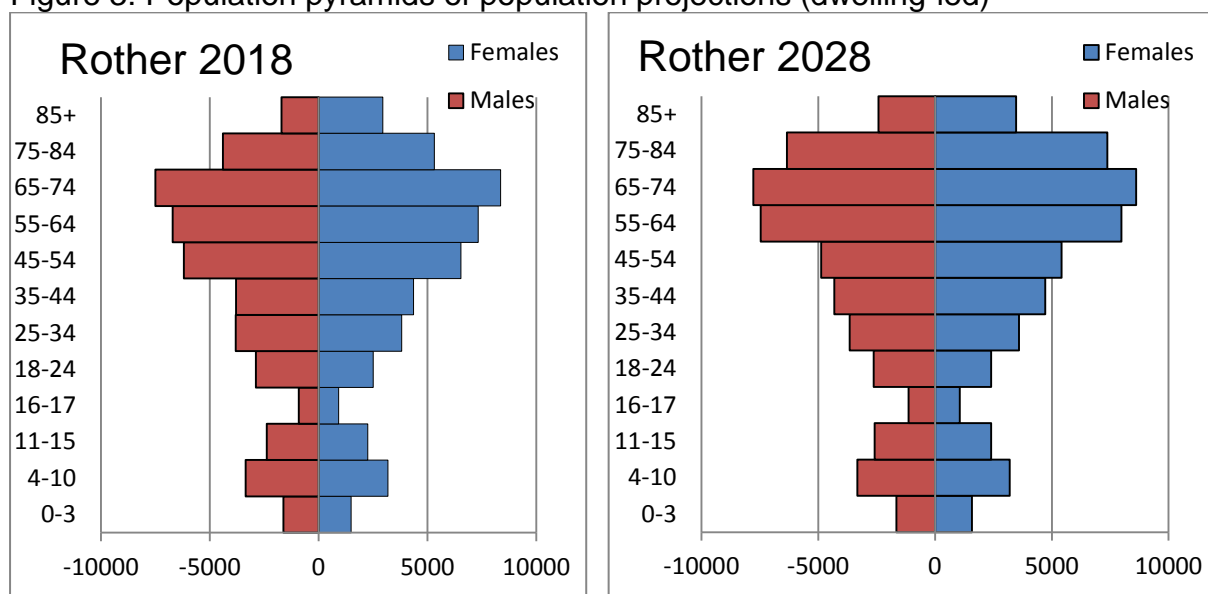
⁹ People aged 65 and over unable to manage at least one mobility activity on their own, by age and gender, projected to 2030. Activities include: going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed

¹⁰ People aged 65 and over with a limiting long-term illness, by age, projected to 2030. Figures are taken from Office for National Statistics (ONS) 2011 Census, Long term health problem or disability by health by sex by age.

many of these options will not meet the level of increasing demand, as the older population grows. One of the highest concentration of older people is within Bexhill at 16.5% of Rother's population.

8.8 Looking at the population projections over the plan period from 2018-2028, it can clearly be seen that as the bulge of 45-74 year olds in 2015 ages it results in a significant number of people aged 55-84 within the District by 2028.

Figure 3: Population pyramids of population projections (dwelling-led)



8.9 Whilst there will always be a proportion of older people who require specialist accommodation, there will be significant number who wish to remain in their own home and buy in care as and when their needs change. Therefore it is important that there is a range of housing types which meet the needs of older people, particularly where homes can be adapted in the future to allow people to remain in their own homes. This is supported by evidence from East Sussex County Council (ESCC) which reports the numbers of people aged 65+ being supported to continue to live independently with higher amounts of visiting support are steadily increasing. Between 2010/11 and 2014/15 the numbers of people receiving 10-15 hours' support increased by 43% to 425, where those receiving over 15 hours' support per week increased by 73% to 291. Bexhill has significantly more older people in receipt of high levels of care than anywhere else in the district. Other areas with noticeable demand are: Rye (56% increase from 2010-11 to 2014-15), Battle (57% increase), Ewhurst (143% increase) and Northiam (109% increase).

8.10 There is currently 73.5% owner occupancy for older people in the District, showing there is potentially a high demand for care in owner occupied property. By 2030, the number of older residents unable to manage at least one self-care activity on their own will increase by some 3,508 people (34%).

POPPI Data (2018)	2017	2030
Total population aged 65 and over unable to manage at least one self-care activity on their own	10,410	13,918

9.0 Summary

- 9.1 Having regard to national Planning Practice Guidance (PPG) advice about relevant data and factors, available evidence suggests that the introduction of the optional accessibility standard M4(2) is justified within the district due to its ageing population and forecast increase in the number of people with mobility issues and limiting illnesses.
- 9.2 By 2028, older person households (i.e. aged 65+) will constitute over 45% of all households in the district. Moreover, the increase in older person households account for over 90% of the net increase in households over the period 2017-2028.
- 9.3 Furthermore, the proportion of the district's population projected to have life-limiting illnesses is projected to be over 25% of the population by 2028, By 2030 it is predicted that 13,918 people over 65 in Rother will be unable to manage at least one self-care activity on their own compared to 10,410 in 2018 (POPPI, 2018), meaning homecare help is likely to be required within people's own homes. Projections for the district indicate that, by 2028, 22.8% of the population will have a disability, up from 20.8% in 2016.
- 9.4 In view of this evidence regarding future households within the District, it is clear that planning policies should support people to continue to live in their home as far as is practicable. It follows that the norm should be for all new homes, regardless of tenure, to meet the optional Building Regulation for accessible and adaptable homes. Exceptions should be rare, but may exist where the requirements would be incompatible with the requirements to retain key characteristics, notably the elevational character and appearance, of Listed Buildings or Conservation Areas.
- 9.5 As noted above, Part M4(3) of the Building Regulations distinguishes between (3a) wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) and (3b) wheelchair accessible (a home readily useable by a wheelchair user, including step-free access). Local Plan policies for wheelchair accessible homes (M4(3)(b)) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.
- 9.6 Data from the Council's Housing Register indicates that there are around 200 people with a mobility issue, with around 9% requiring the use of a wheelchair inside and outside the home. It is therefore reasonable to require around 5% of the total housing on sites where affordable housing thresholds are triggered, to meet this requisite need identified through the Register. As such, it is considered appropriate that schemes where affordable housing is triggered by Policy DHG1 **and** there is a specific identified need for wheelchair accessible housing identified on the Housing Register, that 5% of the total housing is provided as M4(3)(b) dwellings. The obligation to provide M4(3)(b) units will only apply where the 5% requirement triggers the provision of a whole dwelling unit, i.e. every 20th unit in housing schemes.

10.0 Viability

- 10.1 One of the other keys tests highlighted within the PPG is to consider the impact of the standards on the viability of development: *“Local planning authorities should consider the impact of using these standards as part of their Local Plan viability assessment. In considering the costs relating to optional Building Regulation requirements or the nationally described space standard, authorities may wish to take account of the evidence in the most recent Impact Assessment¹¹ issued alongside the Housing Standards Review”*. (Paragraph: 003 Reference ID: 56-003-20150327).
- 10.2 The Rother Local Plan Viability Assessment (October 2018) indicates that the impact on development viability across the district of a 100% requirement for ‘M4(2): accessible and adaptable dwellings’ is relatively limited, particularly as it becomes more common across the country over time. It is noted that in some instances it may be appropriate for flatted developments to provide a smaller proportion of accessible housing, making use of the ground floor accommodation for M4 (2) where a clear viability case is made.
- 10.3 In terms the provision of M4(3) dwellings, whilst there is an increased cost relating to providing the units, given that the policy on applies to every 20th unit on schemes, the requirement, alongside the other policy requirements in the Plan, does not prejudice the viability of sites. Evidence also indicates that there will be cost savings over time as more dwellings get built to these accessibility standards.

11.0 Conclusion

- 11.1 Given the evidence-based need to justify the introduction of higher accessibility standards, consideration has been given as to whether it would be appropriate to apply the requirement to all new housing or a certain proportion. It is considered that the above evidence suggests that the introduction of the optional accessibility standard M4(2) across all housing can be justified within the District due to its ageing population and forecasted increase in the number of people with mobility issues and limiting illnesses.
- 11.2 Data from the Council’s Housing Register indicates that there are around 200 people with a mobility issue. It is considered appropriate that schemes where affordable housing is triggered by Policy DHG1 and there is a specific identified need for wheelchair accessible housing identified on the Housing Register, that 5% of the total housing is provided as M4(3)(b) dwellings.
- 11.3 The Rother Local Plan Viability Assessment indicates that the impact on development viability across the district of a 100% requirement for M4(2): accessible and adaptable dwellings is relatively limited. In terms the provision of M4(3) dwellings, whilst there is an increased cost, the requirement, alongside the other policy requirements in the Plan, does not prejudice the viability of sites.

¹¹ <https://www.gov.uk/government/publications/housing-standards-review-final-implementation-impact-assessment>