



Horsham
District
Council

Horsham District Local Plan Examination

Housing Needs Topic Paper

March 2026 (Version 2)

Housing Needs Topic Paper

Introduction

1. This Topic Paper has been prepared by Horsham District Council (“the Council”) in response to the Inspector’s Letter dated 11 February 2026, which was followed by the Inspector’s Hearings Agenda on 16 March 2026. This paper deals with **Matter 3: Homes to meet the needs of all the community**, issues a to f (issue g, provision for gypsies, travellers and travelling showpeople is dealt with in a separate topic paper):
 - a. The identified level of affordable housing need
 - b. Whether the proportion of affordable housing sought from each site is appropriate
 - c. Whether the mix of homes is appropriate
 - d. The plan’s approach towards self-build and custom housing
 - e. The plan’s approach towards homes for older people
 - f. Accessibility policy.
2. The paper gives a brief overview of national policy and then deals with each of points a. to f. above.

National Planning Policy Framework (December 2023) (NPPF 2023)

3. The Horsham District Local Plan 2023-40 (HDLP) was submitted in July 2024. It is subject to transitional arrangements and being examined under the December 2023 NPPF. Paragraph 63 of that version of NPPF refers to establishing need for different groups in the community and includes affordable housing and other groups with specialist housing needs.
4. For Horsham District, there are two sizeable ‘groups’ with particular housing needs. The first is those who cannot afford to buy on the open market (and in some cases cannot afford private rents). The second group includes those with specialist care or access needs and in particular older people. The sections below summarise relevant national policy and evidence for each of these, in the context of the Inspector’s discussion points.
5. It is acknowledged that the NPPF 2023 makes reference to First Homes, which is a particular form of discount home ownership introduced by the previous government. However, the extant NPPF (December 2024) at footnote 31 states that the requirement to deliver a minimum of 25% of affordable housing as First Homes, no longer applies. Hence whilst First Homes still fall within the definition of affordable housing, and the PPG section titled ‘First Homes’ remains, local plans are no longer required to provide for this specific tenure.

Draft National Planning Policy Framework (December 2025)

6. The Government has set out proposed changes to the extant NPPF (December 2024) which, if enacted, would require authorities to set specific requirements for social rented homes, strengthen support for mixed tenure development, and support the provision of social and affordable housing in rural areas.

The changes would also require authorities to set out the proportion of new housing that should have enhanced accessibility features via building regulation standards M4(2) and M4(3), and ensure plans adequately provide for the accessibility needs of an ageing population and the needs of disabled people. Authorities will need to set requirements for M4(2) that meet or exceed their locally assessed need for this housing, and ensure that need is met.

7. Whilst the proposed changes do not point specifically to any alternative means of assessing such needs, they do suggest future assessments must be more specific on the need for social rented homes and accessible/ disability-friendly homes. The Council considers that the submitted Plan provides sufficient provision for the proposed new NPPF objectives to be material, with any further updates to be provided as part of the future Local Plan review

a. The identified level of affordable housing need

National Planning Practice Guidance – affordable homes

8. PPG section titled ‘Housing needs of different groups’¹ provides the relevant guidance on assessing affordable housing needs. It recommends identifying overall gross need from various data sources, namely homelessness, those in temporary accommodation, overcrowded and concealed households, tenants in unsuitable housing and estimates of ‘households from other tenures in need and those that cannot afford their own homes’. A net need is then derived by netting off ‘churn’ rates, surplus stock and any committed supply of new affordable homes. For plan-making, PPG then advises that the need can then be considered as a proportion of mixed market and affordable housing developments, taking into account the percentage of affordable housing in market housing-led developments.

Northern West Sussex Strategic Housing Market Assessment 2019 (SHMA)

9. An assessment of affordable housing need was undertaken as part of the Northern West Sussex Strategic Housing Market Assessment (SHMA) dated November 2019. It is document **H01** in the examination library. In 2022, the Council commissioned a further report, the Horsham Social Rented Housing and First Homes Study (SRFHS), to look specifically at these categories of affordable housing. Using the same methodology as the SHMA, this updated the need figures on affordable housing. This is document **H10** in the examination library. Whilst a few years old, it is considered these studies – and especially the SRFHS – remain fit-for-purpose in terms of the sources and scale of affordable housing need. The evidence will be further reviewed with the preparation of a new Local Plan which is due to commence later this year.

Local evidence of rented affordable need

10. The SHMA (para 7.20) reports that the method for studying rented affordable housing needs has followed the established SHMA guidance to look at the number of households who are unable to afford market housing (either to rent or buy). In summary, the first stages of assessment are based on:
 - Current need (modelled from local information)
 - Projected newly formed households in need (based on projections and an affordability test)

¹ paragraphs 67-001-20190722 to 67-015-20210524

- Existing needs (based on typologies of household in need and past lettings data)

11. The above elements in combination indicate the overall gross need which is then divided by the years in the Plan period to derive an annual average figure.
12. The supply of affordable homes (before new site allocations are taken into account) is based on trend data over the three years prior to the study. It looks at the number of lettings taking account of the 'churn' (i.e. existing affordable homes becoming vacated, including transfers between housing association properties).
13. The net need for rented tenure affordable is derived from subtracting the predicted supply from the predicted gross need. Table 1 below shows the outcome of this calculation for Horsham District, as calculated in 2019 and 2022 respectively.

Table 1 – Estimated need for Rented Affordable Housing (Table 2.12 in the SRHFS)

	Per Annum as of 2019	Per Annum as of 2022
Current need	42	59
Newly forming households	415	533
Existing households falling into need	151	93
Total Gross Need	607	685
Re-let Supply	263	193
Net Need	344	492

Local evidence of low cost home ownership need

14. The SHMA (para 7.37) indicates that the methodology for assessing the need for low cost home ownership (LCHO) draws on the method set in PPG for rented affordable needs. The consultants have devised a model that equates the need for affordable home ownership as an estimate of the number of households falling within the affordability 'gap' between buying and renting. In other words, it assesses the need as those households who can afford to rent a home without financial support but require support to access home ownership. This same method was used in the SRFHS.
15. Using income distribution data developed for use in the analysis of rented affordable housing need, the SRFHS estimates that in HDC, of all households living in private rental accommodation around 29% of those fall into the "rent/buy gap" outlined in para 15 above. Using this principle, the SHMA/SRFHS methodology uses multipliers derived from the English Housing Survey, and factors in expected new household formation, to derive an estimate of gross need for affordable home ownership homes (Table 2.14 in the SRFHS). A supply of such homes is estimated, based on an assumption that around half of homes sold at prices in the lower quartile of all sales (using land registry sales data) would be available to meet the needs of households with an income gap between buying and renting. The net need is the difference between the two. The outcome of this analysis is shown in Table 2 overleaf

Table 2 - Estimated Need for Affordable Home Ownership – per annum Horsham (Tables 2.14 & 2.15 in the SRFHS)

	Per Annum
Current need	32
Newly forming households	324
Existing households falling into need	48
Total Gross Need	404
Supply (50% of LQ sales)	342
Net Need	62

16. The SHMA makes clear that the analysis above comes with caveats. Paragraph 7.50 of the SHMA states that those with an affordable home ownership need in many cases may have other housing options, such as an ability to rent housing in the market sector without financial support. The SRFHS further states that there could be a significant additional supply of low cost homes from resales of market homes below a lower-quartile price which could also limit the need for affordable home ownership products (Text box, pages 28-29).
17. Nonetheless some households will have insufficient savings to be able to afford to buy a home on the open market (particularly in terms of the ability to afford a deposit), therefore affordable home ownership – and shared ownership homes in particular – will continue to play a role in supporting some households in this respect (see SRFHS paragraph 2.94).

Total affordable housing need

18. As shown in Table 1 and Table 2, **the total net annual need for affordable housing is 554 dwellings per annum (dpa)**. It is notable that this represents 61% of the standard method Local Housing Need of 911 dpa applicable to the emerging Local Plan.

Local evidence arising from the Council's housing register

19. The Council maintains a register of households who have applied and qualify for, suitable affordable accommodation within the District. Eligibility criteria apply which are principally based on income levels and connection to the local area.

As of 23 March 2026, there are 755 households on the housing register, with the greatest stated need being for either 3-bedroom or 1-bedroom homes (see Figure 1). The total has risen in recent years; a significant rise occurred during Covid which has not been recovered from (there were 500-600 on the register before that time).

20. [Format error - paragraph number not used]
21. [Format error - paragraph number not used]

Figure 1 – Households on housing register by stated need (bedroom size)



- 22. The Council's Affordable Housing Strategy and Enabling Lead Officer advises that in recent years, the Council has experienced a significant increase in demand for three- and four-bedroom properties, while the supply of such homes has remained limited. This imbalance continues to grow year on year, and current estimates suggest that applicants for homes of this size may face a waiting time of approximately 10–15 years for larger properties (in part because there are fewer existing properties of these types becoming vacant than for smaller flats and houses). Over the past year, an increase in demand for one-bedroom general needs accommodation has also been observed.
- 23. This information shows that there remains a significant number of households requiring subsidised housing of some form, with signs of the need increasing (or certainly not getting better). The deficit in supply versus need is more acute for family-sized properties. This corroborates the findings of the SHMA, in providing evidence of continued need for a boosted affordable housing supply to meet the needs of Horsham District's communities.

b. Whether the proportion of affordable housing sought from each site is appropriate

[NPPF December 2023](#)

24. NPPF (Dec 2023) paragraph 64 sets out the clear expectation that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required.

[Horsham Local Plan Viability Study](#)

25. As summarised above, there is a high level of need for affordable housing in the District. The submitted Plan therefore sets levels of requirement for affordable housing based on the outcome of the Local Plan Viability Study (document **H12** in the examination library). This reflects that the driver of targets is the ability of sites in the District to viably deliver affordable housing, as it is evident that insisting on the full affordable housing need to be met on sites coming forward would not be financially viable, and sites would therefore not come forward for development.

26. It should be noted that the Horsham Viability Study is currently being updated to ensure that proposed policy requirements, including for affordable housing, have been tested against the most up to date metrics such as development costs and property values. Should this process result in changes to requirements for affordable housing, they will be put to the examination as suggested main modifications.

27. The Viability Study tested a range of site typologies. These were based on market evidence-based data on different residential property values achieved across the District, the expected pattern of proposed residential development, and different site characteristics based on sites that have or are expected to come forward (e.g. greenfield, brownfield, site capacity and density). The study also considered specialist forms of housing namely older person's housing and build-to-rent. A further key input was the assumed timescale for building out on different types of sites. The various typologies were run through a well-established appraisal model which incorporated sensitivity testing for different levels of affordable housing provision.

28. In addition to the typologies representative of non-strategic sites, bespoke testing of seven potential strategic sites was undertaken. A bespoke approach for these sites reflected that more comprehensive, large-scale developments will have very different costs and cashflows compared with smaller sites (for example, schools, new access onto major roads and other major infrastructure may be needed, and build-out will be over a much longer period). The strategic site appraisals were informed by discussions with the respective promoters for those sites.

29. The outcomes of this study are summarised in Section 9 of document **H12**. The key conclusions with respect to affordable housing were:

- i. Non-strategic greenfield sites – these can viably support 45% affordable housing, index-linked CIL and all policy costs. This is based on a tenure split of 70% affordable rent, 25% First Homes and 5% shared ownership. Sensitivity testing has shown that viability reduces with the inclusion of social rented tenures.
- ii. Strategic sites can support 35% affordable housing.
- iii. Brownfield sites of 10 dwellings or more can support 10% affordable housing. Testing has shown that 15% is viable in the higher-value areas but more challenging on lower value brownfield sites.

- iv. Older persons' accommodation is less viable than general needs accommodation due to the higher marketing costs, longer sales periods, reduced building efficiency and higher build costs. Nonetheless, a policy requirement of 30% affordable housing to be viable on greenfield sites. Brownfield sites have more marginal viability therefore flexibility may be required. (However, see section 'Older people's accommodation' below.)
- v. Build-to-rent development is viable on both greenfield and brownfield sites with 40% and 20% affordable private rent respectively.
- vi. Individual potential strategic sites are viable on the basis of 35% affordable housing. On this basis, net residual land value across these sites range from an uplift ranging from 14.97 times existing land value (Buck Barn site) to 38.85 times existing land value (West of Ifield site). The uplifts were assessed as appropriate with regards ensuring a viable development.

[Bespoke target for Land West of Ifield](#)

30. The submitted Plan states in paragraph 10.90: *“Given the particular housing needs of the area, as evidenced in the emerging Crawley Local Plan, together with the long term public ownership of the site, it is considered that there is potential for 40% of homes on this site to be affordable homes.”* This is reflected in the site allocation, Strategic Policy HA2 part 2b – which requires a minimum of 40% of the approximately 3,000 homes to be provided will be affordable homes – and also in the footnote to Strategic Policy 39: Affordable Housing.
31. The higher target for this particular site reflects that the site will function as an urban extension to Crawley, and the adopted Crawley Local Plan sets a target of 40% affordable housing for C3 residential developments outside Crawley town centre. It also reflects the position of Crawley Borough Council as expressed in strong terms in their Regulation 19 representations.
32. The Council has issued an addendum to the Viability Study (document **HDC15** in the examination library). This presents the outcome of an updated appraisal which reflects the 40% requirement at West of Ifield. It was found that, whilst the additional 5% affordable housing reduces the scheme GDV and residual land value, it still maintains an uplift on the existing use value equivalent to 35.13 times the assumed existing use value. This is higher than the range of multiplier premiums typically quoted for greenfield sites of 10 – 20 times the existing use value. As such, the increased provision of 40% affordable housing does not change the conclusions drawn in the original assessment and it is concluded that the site is viable and deliverable at this level of affordable housing.

[Older people's accommodation](#)

33. The Viability Study initially tested a typology for older people's housing reflecting the types of self-contained older person's accommodation generally seen coming forward in the District. This had generally been age-restricted flatted accommodation or C2 use sheltered housing. As mentioned in paragraph 29, a 30% affordable element was found to be viable (with a 70%/30% split for rented/low cost ownership).
34. However, representations were received at the Regulation 19 stage which challenged the premise of this, as it may not truly reflect the additional costs associated with Extra-Care Housing (ECH). This is a more specialist form of supported housing for those with additional care needs (generally, but not exclusively, older people) which are provided on-site. The Council accepted that this needed review, and the Viability Study Addendum (document **HDC15**) tested a further typology specifically for ECH. This found that there was insufficient viability to support any element of such development as subsidised affordable.

35. Whilst the report suggested this could be remedied by reducing base build costs by 15% and assuming an increase in sales values of 18%, the Council did not consider there to be sufficient evidence that such schemes would be delivered whilst also providing affordable units. Therefore, main modifications are proposed to remove this requirement – see the Schedule of Suggested Modifications to the Regulation 19 Local Plan (document **SD14**) modifications SM43 and SM44.
36. For avoidance of doubt, there is no proposed policy requirement for development of residential care homes (i.e. not self-contained) to provide affordable housing.

c. Whether the mix of homes is appropriate

National Planning Practice Guidance – needs of different groups

37. PPG does not specify any requirement for local plans to set out a specific mix of dwelling sizes. However, PPG paragraph 67-001-20190722 does advise that plan-making will need to consider the extent to which the identified needs of specific groups can be addressed in the area and reflect this in planning policy. The paragraphs below explain why the Council has, in light of local evidence, taken this forward through considering the mix of dwelling sizes.

Local evidence of need for different sizes of dwellings

38. The SHMA (document **H01**) uses 2011 Census data as a baseline and has found that 3-bed properties were the most prevalent in Horsham District. The District also displays a larger proportion of 4+ bedroom properties, with 28% of homes having 4 or more bedrooms. The District has a low proportion of 1-bed properties. Table 3 identifies the existing housing stock in Horsham by tenure and type:

Table 3 - Existing housing stock, Horsham District (%) (Source: SHMA / Census 2011)

	Detached	Semi-detached	Terraced	Flats	Total
Owner-occupied	35.9	20.3	12.7	6.2	75.1
Social rented	0.2	3.6	2.2	5.6	11.6
Private rented/living rent free	2.7	2.9	2.2	5.5	13.3
Total	38.8	26.8	17.1	17.3	100.0

39. This skew within the existing dwelling stock was recognised as a potential barrier to people getting access to the sizes of homes needed, which is clearly contrary to the objectives of the Plan. The SHMA project brief therefore included consideration of an appropriate strategic housing mix to be applied to new residential development.
40. In developing a strategic housing mix for new developments, the SHMA used 2011 Census data as a baseline, but drew on analysis of the needs of the different groups referenced in the SHMA (younger people, family households, older persons, and those with disabilities).
41. Section 11 of the SHMA explains that a model was developed which starts with the current profile of housing in terms of size (bedrooms) and tenure, then uses demographic projections to predict changes in numbers within defined age groups. On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it is therefore possible to work out what profile of housing is needed over the assessment period. The report notes that this is not a simple task, given that changes in household type (single person, family, older couple downsizing etc.) are not the only determinant in

demand for and availability of dwelling types, as the ability to afford a particular size of dwelling is also an important factor. The SHMA (H01 paragraphs 11.5 to 11.16) sets out the methodology for this.

42. The SHMA’s strategic conclusions on the homes needed across different tenures in the District is set out in Table 4 below.

Table 4 – SHMA recommended strategic housing mix of homes based on tenure

Properties by size	Affordable rented	Low cost home ownership	Market housing
1-bed properties	35%	25%	5%
2-bed properties	30%	40%	30%
3-bed properties	25%	25%	40%
4+ bed properties	10%	10%	25%

43. It can be noted that the 2022 **Horsham Social Rented Housing and First Homes Study (SRFHS)** (document H10) considered afresh the required mix of affordable dwellings, and concluded the same overall strategic mix as had the SHMA.

[Policy approach to meeting the need for different sizes of dwellings](#)

44. **Strategic Policy 38: Meeting Local Housing Needs** aims to provide a wide choice of homes to meet a range of accommodation needs, whilst allowing some flexibility in terms of the site and its characteristics, including location. The Plan includes Table 9 alongside Strategic Policy 38 which carried over the recommendations of the SHMA (as summarised in Table 4 above) by setting out the appropriate strategic mix of home sizes based on tenure.

d. The plan’s approach towards self-build and custom housing

[National Planning Practice Guidance – self- and custom-built homes](#)

45. Planning Practice Guidance² advises that to obtain a robust assessment of demand for this type of housing in their area, local planning authorities should assess and review the data held on their registers. This assessment can be supplemented with the use of existing secondary data sources such as building plot search websites and enquiries to local estate agents for building plots.

[Local evidence of need for self- and custom-built homes](#)

46. The Council maintains a Self and Custom Build Register.³ As of 02 March 2026, there are 178 entries on the register. Of these, 127 are Horsham District residents. However, the number of people registering over a year period has been declining since peaking at 45 in 2020/21; there were just 6 new joiners in the year to 30 October 2025, 4 of whom were residents of the District. Conversely there was a peak in planning permissions for self-build plots in that year, with 44 new plots permitted. There has now been a total of 85 plots granted permission since the start of monitoring in 2015.

² (Housing needs of different groups, para 67-003-20190722)

³ https://www.horsham.gov.uk/data/assets/pdf_file/0006/161583/HDC_SCB_Register_Report_February_2026.pdf

[Policy approach to meeting need for self- and custom-built homes](#)

47. It is acknowledged that the SHMA recommended that a minimum, specific proportion of homes on larger sites could be for self- and custom-build. However, the Council has concluded that a more proportionate approach is appropriate which reflects the up-to-date need across the District and trends apparent with both people joining the register and permissions. This more proportionate approach is to require all developments to factor in up-to-date evidence of demand for self-build and provided a suitable number of plots on the site, as per proposed **Strategic Policy 38**. This is in any case happening as some large site developers have embraced the provision of some self-build plots even without there being a local policy requirement.
48. Additionally, attention is drawn to **Strategic Policy HA1: Strategic Site Development Principles** in the submission Plan. Part 6 of this policy requires that strategic allocations will be expected to take into consideration the demand for self-build and custom build housing and provide enough serviced plots of land to meet the identified need.

e. The plan's approach towards homes for older people

[National Planning Practice Guidance on housing for older people](#)

49. The PPG section titled 'Housing for older and disabled people'⁴ has been used. Guidance signposts Government-sponsored sources of data including Census, the Strategic Housing for Older People Analysis Tool, and Department of Work and Pensions data on claimants of benefits for supporting disabled people. However there is no particular methodology recommended for translating sourced data into a quantified assessment of need.

[Local evidence of need for people with care needs](#)

50. The SHMA underpins the justification for the Council's policy position. It sets out a clear methodology which is used to estimate the need firstly for self-contained uses (which includes retirement/sheltered housing, enhanced sheltered housing and extra-care housing), and separately for residential care bedspaces (which includes both care homes and nursing homes).
51. Elements of the SHMA were updated for Horsham District in September 2022, including with respect to the need for older people's specialist housing: this is presented in the **Horsham Social Rented Housing and First Homes Study (SRFHS) (H10)**. The SRFHS (text box 'Specialist Affordable Housing – Summary, page 39) estimates a net additional need for 610 housing units with support (sheltered/retirement housing) in Horsham over the 2021-38 period, of which 29 would be affordable, and a need for 563 additional housing units with care (e.g. extra-care) of which 63 would be affordable. These generally fall into C3 use class. In addition, the SHMA also states there is a need for 746 residential care bedspaces (C2 use class) in Horsham over the period 2021-38.
52. However, more recent evidence and advice available from West Sussex County Council (WSCC), as the statutory provider of specialist care, stresses the need to prioritise delivery of extra-care housing over residential institutions such as Care Homes (C2). There is an imbalance of provision in the County towards Care Homes (C2) and the County wishes to develop the provision of Extra Care Housing (C3), to enable older people, and those with an assessed care need to remain as independent as possible for

⁴ paragraphs 63-001-20190626 to 63-019-20190626

as long as possible. The WSCC Extra Care Housing Market Position Statement⁵ was last updated in August 2024 and provides clear evidence supporting the WSCC position. This includes identifying a gap between currently projected demand and supply of 137 extra care units in Horsham District by 2035. The Statement also highlights that whilst the majority of this need arises in the older age population, an element is for adults under 55. WSCC is therefore keen to focus on the delivery of extra care housing on suitable sites to enable as many people as possible to live independently albeit with 24/7 care teams on site.

53. WSCC does not expect significant growth in the need for residential care. Its Older People's Bed-based Care Market Position Statement⁶ explains that West Sussex already has a relatively high number of residential care homes compared with other areas. With a policy focus on helping people remain at home and on expanding Extra Care Housing, WSCC forecasts an oversupply of around 650 residential beds countywide by 2035.
54. However, Horsham District is expected to have a small shortfall of about 35 older people's bed-based care places, even after factoring in planned Extra Care Housing. The Bed-based Care Statement recommends that Horsham maintains a strong supply of nursing and specialist dementia care and supports modest growth in services for people with complex needs, especially dementia, as local demand for these services is expected to remain high.

[Policy approach to meeting the need for people with care needs](#)

55. **Policy 42** of the Plan provides a positive framework for meeting the growing need for specialist housing for older people in the district, with reference to continuing care housing, retirement housing and specialist care including residential care homes and extra-care housing. This responds to the needs identified in the SHMA (document **H01**) and also the more recent Horsham Social Rented Housing and First Homes Study (SRFHS) (document **H10**) (see paragraph 51 of this paper). Whilst WSCC advise there is overall no significant net increase in the supply of residential bedspaces, the forecasts used to support that position are only until 2035 and it is also the case that WSCC advise flexibility of response to the rapidly growing older population, in particular those with high dependency needs.
56. Further to this, **Strategic Policy HA1: Strategic Site Development Principles** states in part 5 that strategic sites should make provision for older people. Strategic Policies **HA2**, **HA3** and **HA4** are the strategic site allocation policies, and these too specifically require provision for older people.

f. Accessibility policy

[National Planning Practice Guidance on accessible homes](#)

57. In addition to para 49, PPG (63-009-20190626) poses the question, "Should plan-making bodies set minimum requirements for accessible housing?" and advises that where an identified need exists, plans are expected to make use of the optional technical housing standards⁷ to help bring forward an adequate supply of accessible housing. In doing so planning policies for housing can set out the proportion of new housing that will be delivered to the standards M4(2): Accessible and adaptable

⁵ <https://www.westsussexconnecttosupport.org/alt-home/market-position-statement-and-commissioning-strategy/west-sussex-county-council-extra-care-housing-market-position-statement/future-need-for-extra-care/>

⁶ <https://www.westsussexconnecttosupport.org/alt-home/market-position-statement-and-commissioning-strategy/west-sussex-county-council-older-people-s-bed-based-care-market-position-statement-june-2024/older-people-s-bed-based-care/>

⁷ <https://www.gov.uk/guidance/housing-optional-technical-standards>

dwellings, and M4(3): Wheelchair user dwellings. Such policies need to be based on evidence of need, viability and consideration of site-specific factors.

[Local evidence of need for people with disabilities](#)

58. The SHMA (**H01**, Section 10 & Text Box on page 134) sets out clear evidence not only of an ageing population, but also evidence of an increasing requirement to consider the mobility needs of an ageing population. The SRFHS (**H10**, paragraph 3.13 and Text Box, page 39) further highlights a projected increase of 53% of people aged 65+ with a mobility problem, which represents 16% of total projected population growth.
59. The Council's Affordable Housing Strategy and Enabling Lead Officer has advised that the housing register shows a clear shortage of three-bedroom, ground floor wheelchair-accessible properties or one-level living accommodation of this size. They observe that a growing number of households require mobility adaptations; however, larger homes that become available are often not suitable for these needs.

[Policy approach to meeting the needs for people with disabilities](#)

60. The evidence in the SHMA (**H01**) and the SRFHS (**H10**) provides strong justification for the optional technical standards for adaptability and accessibility and wheelchair user housing standards (Building Regulations Approved Document M – Volume 1: Dwellings) being required in the Plan. **Policy 40: Improving Housing Standards in the District** thus requires all new dwellings to meet M4(2) standard, and for sites providing 20 or more homes gross, a minimum 5% to meet M4(3) standard provided there is evidence of need on the housing register.
61. As mentioned in paragraph 6 above, the Government proposed to set out in the NPPF the proportion of new housing that should have enhanced accessibility features via building regulation standards. The draft NPPF Policy HO5.1(b) states that in relation to accessible housing, the development plan should set out the proportion of new housing that should be delivered to requirement M4(2) and M4(3) of the Building Regulations. M4(2) requirements should reflect local levels of need, and should ensure that at least 40% of new housing delivered over the course of the plan is delivered to M4(2) or M4(3) standards. It is clear from this that the direction of travel is for these enhanced standards to be the norm. Therefore Policy 40 in the Plan is well aligned to emerging future national policy.