

**MID SUSSEX DISTRICT COUNCIL SITE ALLOCATION DPD
MATTER 2 HEARING STATEMENTS
SUBMITTED ON BEHALF OF RETIREMENT VILLAGE DEVELOPMENTS LTD & NOTCUTTS LTD**

2.1 Is the Plan Supported by the SA and HRA?

1.1 No. See 2.2 below.

2.2 What Evidence is there that the SA has influenced the Plan and or/undertaken a full assessment of realistic alternatives?

1.2 None. Paras 3.10-3.16 of the SA (SUS1) summarise the Human characteristics of Mid Sussex. It specifically identifies that:

- Age group 65yrs+ is predicated to increase by almost 50% (increase from 28,499 to 42,722) with an increase in the over 90's age group of 118% (our emphasis) (para 3.15);
- Life expectancy is increasing (para 3.15);
- Aging population will increase pressure on health care & social services (para 3.16);
- It is important new and existing housing stock is suitable to meet the needs of an aging population (para 3.16); and
- Appropriate housing offers the potential to reduce expenditure on public services and promote older people's independence and wellbeing (para 3.16).

1.3 Associated sustainability issues and challenges (para 4.2) identified the need for additional infrastructure to meet needs and increased demands of an aging population on health and social care. These issues then failed to be translated into the "Social" sustainability objectives (para 5.6), which only considered completions for both general market and affordable housing . It included no other qualitative considerations thus failing to include assessment criteria that addressed the sustainability challenges it identified.

- 1.4 The SA also relied on a site selection process (summarised in section 4 of SUS1¹) which similarly failed to include any qualitative analysis on whether sites promoted could support the provision of specialist accommodation (specifically extra care). Nor did it adjust the assessment process to take account of the sustainability credentials of other forms of housing to ensure the need identified need was met².
- 1.5 As a result of these matters both individually and cumulatively, the SA has been unable to assess the “reasonable alternatives”. It failed at the outset to consider the impacts of not addressing the housing needs of the elderly (an identified challenge) which could have been met through the provision of specialist accommodation, and, was informed by a site selection process that did not consider the specialist housing needs of the elderly as a matter that needed to be addressed. As such the SA has been prevented from and does not assess credible alternatives that could have addressed this need and is therefore falling short of its duty in this regard.
- 1.6 As an evidence base document informing the Plan, the Plan too has been misdirected in this matter and as such also fails to be “consistent with National Policy” (NPPF, para 32) and therefore fails to meet the soundness test of “Justified” in accordance with the NPPF (para 35).
- 1.7 As set out in our Matter 3 and 7 Statements, actions have been suggested to address this issue and make the Plan “Sound” through the inclusion of the Former Hazelden Nursery as a site allocation³ and inclusion of a new development control policy for extra care.

2.3 Do any adverse effects identified in the SA require significant mitigation, and how does the Plan address these issues? Has appropriate account been taken of the recent People Over Wind & Sweetman v Coillte Teoranta (C-323/17) Judgement in the ECJ (often referred to as the Sweetman 2 Judgement)?

- 1.8 No. For the reasons above this is unclear on the basis of a flawed assessment approach which has yielded the conclusion below (SA,pg 90), without the necessary qualitative assessment.

¹ See detailed comments in Reg 19 representations on the selection process.

² See Section 4 of our Representations to the Reg18 Plan as appended to our Reg19 Reprs.

³ An assessment of the Site was undertaken against the Council’s site selection proforma as part of the Reg18 Reprs appended to the Reg19 Reprs. It demonstrated that the site performed well.

"1-Housing

All proposed site allocations make a positive contribution towards the residual housing need, and have demonstrated deliverability. This supports the sustainability objective to ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford."