



**MID SUSSEX DISTRICT COUNCIL SITE ALLOCATION DPD
MATTER 7 HEARING STATEMENTS**

SUBMITTED ON BEHALF OF RETIREMENT VILLAGE DEVELOPMENTS LTD & NOTCUTTS LTD

7.1 Development Management: Does the Plan provide sufficient guidance to cover all the relevant aspects of development management which are required to achieve the satisfactory implementation of the Plan?

1.1 No. As set out in our Matter 3 Statement, to comply with the requirements of the Adopted Development Plan and to be "Consistent with National Policy" the Plan must address the identified significant shortfall for leasehold extra care provision to secure the delivery of sustainable development and satisfactory implementation of the Plan. The following policy has therefore been proposed:

There is an identified need for at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold. The Council will support proposals that will contribute to meeting this need. Such developments will be permitted within towns and villages within the defined built-up-area boundaries, having regard to Local Plan Policy DP26: Character and Design.

Outside defined built-up area boundaries, proposals for C2 extra care development will be supported where a site is allocated for that purpose either in the Site Allocations DPD or a Neighbourhood Plan, or it can be demonstrated that:

- **The Site is contiguous with or does not cause significant harm to the existing pattern of development in the settlement; and**
- **The development is demonstrated to be sustainable having regard to the accessibility of local services and facilities and any services and facilities that might be provided as part of the proposals; and**
- **In meeting the need for C2 extra care, the proposal would outweigh any conflict with other adopted policies, having regard to the degree of harm and benefits the scheme will deliver.**

1.2 The proposed policy would fall within the remit of a Development Management Policy and provides positive guidance to assist in the delivery of specialist accommodation, which is



necessary to meet the soundness tests of "Justified" and "Effective" in accordance with the NPPF (para 35).

- 1.3 The proposed policy is consistent with the proposed policy allocation of the Former Hazelden Nursery, as also set out in Matter 3.

7.2 Uncertainties and Risks: Overall, does the Plan take sufficient account of uncertainties and risks? How flexible is it?

- 1.4 No. There is an identified significant and growing need for specialist accommodation, specifically for extra care. This was recognised by the Inspector in the Albourne Appeal decision¹. The Inspector, found that "*...the evidence indicates a significant level of current unmet need, in particular for extra care leasehold....*" As set out in Matter 3, the Council's current policy framework is failing to address that need, which is only projected to increase. The policy interventions proposed now in the form of both the new policy (paragraph 1.1 above) and the proposed policy allocation for the Former Hazelden Nursery, (see above and Matter Statement 3) would;

- Address the uncertainties and risks around continued non-delivery, take positive steps to address this need;
- Remedy the Council's current strategy of leaving this matter for the next Local Plan Review; and
- Assist in addressing the failure of the Plan to meet the soundness tests in the NPPF (para 35).

- 1.5 Waiting for the Local Plan review only further exacerbates issues of non-delivery and in doing so limits choice, impacting people's ability to find homes to meet their needs, contrary to the NPPF (paras 59 & 61). In the case of extra care accommodation, this can further negatively impact the health and well-being of residents and result in additional unnecessary strains on the health service. This is contrary to the NPPF and its aim to promote healthy communities (para 91-94), a social objective of sustainable development (para 8a).

¹ See Appendix 1 to the Matter 1 Statement



- 1.6 Notwithstanding the above, and as set out in our Matter Statements 1, 2 and 3, the need for specialist extra care accommodation should have been addressed at the outset, in accordance with adopted policies and National guidance.