

planning
transport
design
environment
infrastructure

Response to Inspector's Issues & Questions: Matter 3.3 Response
on behalf of Option Two Development Ltd

May 2021 JB/13366



1 Introduction

1.1 Site Context

1.1.1 This response is prepared on behalf of Option Two Development Ltd ("Option Two"), who control land at Courthouse Farm, Copthorne Common Road, Copthorne and have been promoting it for residential allocation in the Site Allocations DPD.

1.1.2 The site is described further in our Regulation 19 submission. It could be developed either for standard residential development, or a combination of a Class C2 care home, and residential development as set out in Appendices 1 and 2 to our Regulation 19 submission. Indeed they have operators and national house builders/developers who have expressed an interest in developing the site.

Previous representations

1.1.3 My client has promoted Courthouse Farm through the Call for Sites and has made representations to the DPD at both the Regulation 18 and Regulation 19 stages.

2 Matter 3.3: Housing Delivery over the Plan Period

Additional sites: Bearing in mind the above considerations, and the requirement of paragraphs 67 and 68 of the Framework, should the Plan identify an increased number of specific, deliverable sites in the form of housing allocations?

2.1.1 Yes. An increased supply of smaller and medium sized sites, such as Courthouse Farm, should be allocated in order to provide greater flexibility and deliverability, as encouraged by paragraph 68 of the Framework.

Qualitative aspects of housing supply: Is there a need for any qualitative parameters for housing provision in the Plan, such as provision for affordable housing, starter homes, older persons' accommodation (Use Class C2), care homes, accessible housing, student housing, self-build housing and accommodation for gypsies and travellers; on the latter point, does the Plan enable the implementation of District Plan policy DP 33 [Gypsies, Travellers and Travelling Showpeople]?

2.1.2 It was established in the recent Albourne care home appeal decision (paragraph 93 of **Appendix 3** of our Reg 19 reps) that there is a significant level of current unmet need for Class C2 older persons' accommodation in particular, which will significantly increase over the local plan period.

2.1.3 That decision concluded that there is now a need for between 244 and 552 extra care units in Mid Sussex. The Inspector criticised the Council's failure to recognise

an unmet need that is clearly evident. In making these comments, the Inspector took account of the single draft allocation in the DPD (SA20) which includes a C2 care community as part of a larger housing allocation. The draft allocation does not provide any further information on the size of the proposed care community, and indeed there is no certainty that the developer will want to deliver this aspect of the wider allocation.

- 2.1.4 The plan is therefore unsound. Despite Policy DP30 stating that such a need should be met through allocations in the Site Allocations Plan, only one site is identified, without any quantum being specified. The clear unmet and increasing need for Class C2 accommodation is clearly not being met in the Site Allocations DPD and suitable additional sites, such as Courthouse Farm, should be allocated for this use.