

planning
transport
design
environment
infrastructure

Response on Action Point AP18
on behalf of Option Two Development Ltd

October 2021 JB/13366



1 Introduction

1.1 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.

1.2 Purpose of this response

1.2.1 This response has been prepared further to the Inspector’s request of 28 September 2021 inviting responses to Action Point AP18.

1.2.2 Action Point AP18 stated:

AP18 – Matter 7.1 Development Management - Taking Barton Willmore’s suggested text as a start, Barton Willmore and Turley to suggest by way of a collaborative approach with MSDC, a possible policy covering specialised older persons’ housing, to be applied at a District wide level.

1.2.3 Document MSDC-15 sets out a response to AP18 by MSDC, Barton Willmore and Turley. We have reviewed that response and provide our comments below.

2 Response to MSDC-15

2.1 Amended wording proposed by Barton Willmore and Turley

2.1.1 Barton Willmore and Turley has proposed amended wording for a care home policy, as follows. Option Two fully supports the proposed wording, subject to two minor additions below (in bold underline) which are considered necessary for clarity:

Policy xxxx – Specialist accommodation for Older People & Care Homes

There is an identified need for specialist accommodation for older people comprising at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold. The Housing and Economic Development Needs Assessment Addendum (August 2016) identified forecast demand for care homes (Use Class C2) at 2031 as 2,442 bedspaces. The Council will support proposals that will contribute to meeting these types of specialist accommodation.

Proposals for specialist accommodation for older people and care homes that contribute to meeting the identified need will be supported:

*a) **Where the site** is allocated for such a use within the District Plan, Site Allocations DPD or Neighbourhood Plan; or*

*b) **Where the site** forms part of a strategic allocation; or*

c) On sites within built up-area boundaries, having regard to Local Plan Policy DP26: Character and Design; or

d) Notwithstanding Policy DP6 in the Adopted Local Plan, on sites outside defined built-up area boundaries, proposals in excess of 10 dwellings 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:

i. the site is well related to existing development, with appropriate access to, or provision of, services and facilities either on or off site, to meet the needs of residents/staff and which contribute to the wider economy; and

ii. the proposal seeks to reduce the reliance on the private car, having regard to the use proposed.

Such proposals should be accompanied by a Travel Plan which sets out how the proposal would seek to limit the need to travel and how it offers a genuine choice of transport modes, recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.

2.1.2 We agree with the reasons for this wording as set out in the supporting text, especially the recognition that due to its nature, specialist older persons accommodation can be suitable on sites which may not otherwise be suitable for

general C3 housing due to the reduced car trips associated with such uses and the potential for services and facilities to be provided on site.

- 2.1.3 Option Two understands and agrees with the rationale for including the identified need figure within the policy wording, but would be equally content for it to be referred to in the supporting text. We agree with both Barton Willmore and Turley that it is paramount that the extent of unmet identified need is established in this Plan.

2.2 Amended wording by Mid Sussex District Council

- 2.2.1 We generally agree with Barton Willmore and Turley’s commentary on the Council’s proposed draft policy. In particular, we strongly agree that the policy should not be allowed to preclude sustainable sites from coming forward simply because they are not contiguous with the built-up area boundary.
- 2.2.2 There are significant areas of Mid Sussex which are clearly built-up in nature, accessible by non-car travel modes and are sustainable locations for this form of development, but which are not located within or immediately adjacent to the Built Up Area Boundary. Given the extent of the need, it is essential that appropriate sites within these areas are not precluded from coming forward to help meet the need.

2.3 Other Comments

- 2.3.1 Option Two supports and agrees with the rationale put forward by Barton Willmore and Turley in support of their proposed policy. It is clear that the Council has not taken account of the true extent of the need for specialist accommodation, and is continuing to “kick the can down the road” rather than properly planning for the required delivery to meet this need. Furthermore, the existing policy framework is failing to address the need.
- 2.3.2 Option Two continues to promote the allocation of Court House Farm, Copthorne to assist with the delivery of specialist housing, and we remain of the view that such an allocation should be made within the plan.