

Matter 3 – Homes to Meet the Needs of All the Community

Hearing Statement

REPRESENTOR

Option Two Development Ltd

DATE

February 2026

Introduction

This Hearing Statement has been prepared on behalf of Option Two Development Ltd in relation to the upcoming Examination in Public (EiP) Hearings on the emerging Mid Sussex District Plan 2021-2039. This Statement should be read in conjunction with representation submitted on the Regulation 19 Draft Consultation in February 2024 (See **Appendix 1**).

Option Two Development Ltd has an option on land at Courthouse Farm, Copthorne Common Road, Copthorne which lies on the northern end of the district, towards the boundaries of Crawley and Tandridge. Since the submission of the above representations, two outline planning applications have now been submitted for the site, comprising a residential development of approximately 86no. new homes (reference DM/25/3021) and an extra-care retirement community (reference DM/25/3020). Copies of the indicative site layouts are contained within **Appendix 2**.

This Statement responds to the Matters, Issues and Questions dated 13th January 2026. It also considers the additional documents provided by Mid Sussex District Council (MSDC) in January and February 2026, namely:

- MS-TP1 – Updates Since Submission
- MS-TP2 – Housing
- MS-TP3 – Employment

Document reference MS-TP3 is not relevant to this Statement and is not discussed any further.

Separate Hearing Statements have been prepared to address Matters 5 and 6.

(a) The Plan's Proposals in Respect of a Mix of Sizes and Types of Home

No comment.

(b) Affordable Housing

No comment.

(c) Homes for Older People

Over the plan period MSDC have identified that there is an estimated need for 1,887 additional dwellings with support or care and 211 additional bedspaces (net spaces). This was based on the SHMA published in 2021. The SHMA Update (2024) makes reference to new population projections, data on the relative health of the older person population of the district, and estimates of the supply of different forms of housing using information provided by the Council.

Paragraph 4.10 of the SHMA Update states that the baseline supply estimates for housing with support and residential/ nursing care homes are lower than in the 2021 SHMA. There has been an overall decrease in the number of bedspaces available, particularly in nursing care. Increases however have been seen in the number of housing with care bedspaces.

Overall, the total estimated need by 2038 has increased and should be updated in Draft Policy DPH4 (older persons' housing and specialist accommodation) to **2,222** dwellings, accounting for deliveries since 2021, plus 690 bedspaces. This has been calculated using the same methodology as the 2021 SHMA report and the Regulation 19 Draft Policy. It should be noted that the figures contained in the 2024 SHMA have not been reflected in the report provided by MSDC in response to the previous Inspector's query on the 'prevalence rate' approach to calculating older persons' needs (see document title 'Action Point AP-017 – Calculating Older Persons Housing Needs'). It is important that Draft Policy DPH4 is updated to reflect the latest available evidence.

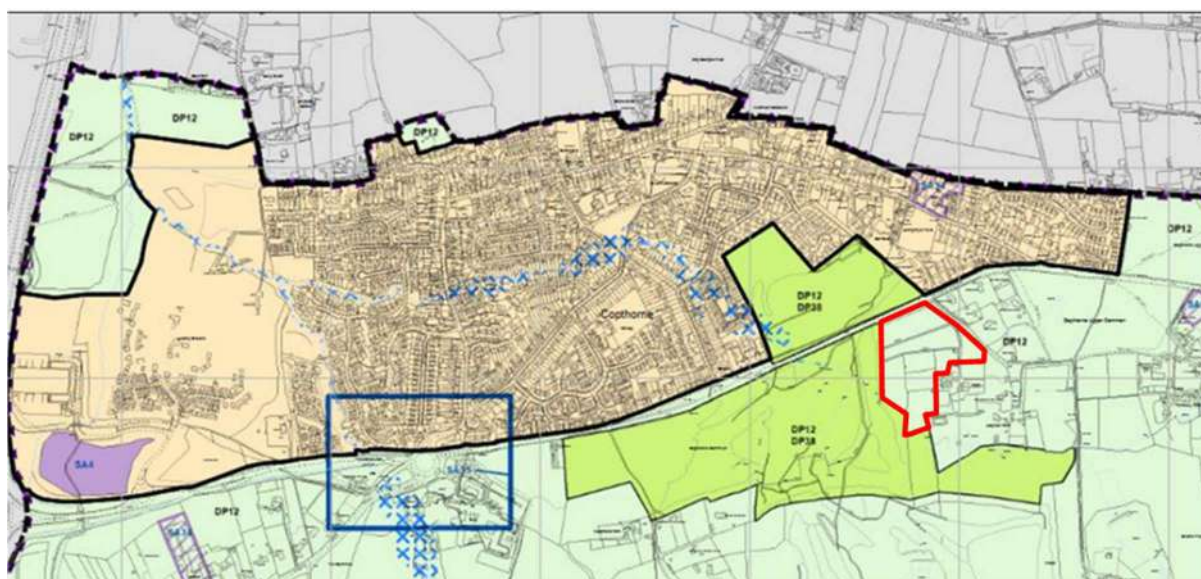
Sites with planning permission were not included in the original need figure so are excluded. This is recommended by Iceni in Table 6.1 and paragraph 6.11 of the SHMA Update (Document H6) and, while it has been acknowledged in MS-TP2: Housing, it has not been included in MS08: Development Management Policies – Proposed Modifications.

Furthermore, and as noted in our previous recommendations, we are supportive of Part 3-5 of Draft Policy DPH4 given the significant need of this form of development. In our previous representations, however, we have encouraged this policy to be reworded to provide proper flexibility to deliver the identified need.

As presently drafted, the policy requires potential development sites for specialist housing for the elderly to be located (amongst other things) contiguous to (i.e. touching) the Built-Up Area Boundary. This is, in practice, very hard to achieve in some settlements such as Copthorne where the BUAB has been drawn in such a way as to prevent any development from being contiguous with much of the BUAB. Together with other nearby constraints such as the Green Belt and District boundary to the north and other protected

environmental sites, any meaningful growth in Copthorne would need to be located to the south of the village. Any sites to the south would lie beyond Copthorne Common Road and notably the line of the BUAB immediately north.

As demonstrated by the application submitted for older people's housing on land at Courthouse Farm – details which were not available at the start of the Examination – it is clear that development can be achieved on land that it **almost** contiguous with the BUAB, but with it being separated by the A264 it does not fully comply with the policy despite being in a sustainable location. Our proposed amended wording would address this issue, enabling the policy to be more **positively prepared** and **effective**.



(d) The Provision of Accessible Homes

No comment.

(e) The Provision of Student Accommodation and Other Specialist Accommodation

No comment. Please see previous comments regarding homes for older people.

(f) Self-build and Custom Homes

No comment.

(g) Rural Housing

No comment.

(h) Rural Exception Sites

No comment.

(i) Sites to Meet the Accommodation Needs of Gypsies, Travellers and Travelling Show People

No comment.

APPENDIX

1



planning
transport
design
environment
infrastructure
land

Mid Sussex District Council – District Plan Regulation 19 Consultation

Courthouse Farm & Firs Farm

On behalf of Option Two Development Ltd

February 2024
DHA/RT/JB/33117



Planning. Inspiring. Delivering.

Maidstone
01622 776226

Gatwick
01293 221320

London
020 3005 9725

www.dhaplanning.co.uk

CONTENTS

1	INTRODUCTION.....	3
1.1	PURPOSE OF THIS STATEMENT	3
2	STRATEGIC BACKGROUND.....	4
2.1	CURRENT DISTRICT PLAN STRATEGY	4
2.2	DISTRICT PLAN REVIEW	4
3	EVIDENCE BASE.....	5
3.1	INTRODUCTION	5
3.2	SUSTAINABILITY APPRAISAL	5
	Assessment of Site A (Firs Farm) and Site B (Courthouse Farm).....	6
	Assessment of Crabbet Park	7
4	RESPONSE TO THE DRAFT DISTRICT PLAN – GENERAL TOPICS	8
4.1	HOUSING.....	8
	Residual Need, Housing Supply and Trajectory	8
	Proposed Strategy	8
	Comments on Draft Policy DPH1 (Housing)	10
4.2	COMMENTS ON DRAFT POLICY DPSC2 (LAND AT CRABBET PARK)	12
4.3	THE SITE SELECTION PROCESS.....	12
	Assessment of Firs Farm.....	13
4.4	ASSESSMENT OF COURTHOUSE FARM	17
	Quantum of Development	17
	Biodiversity.....	18
	Landscape Effects	19
	Comparison with other Copthorne SHELAA Sites	20
4.5	OLDER PERSONS HOUSING AND SPECIALIST ACCOMODATION	20
	Older Person’s Housing Need	20
	Courthouse Farm	23
	Firs Farm.....	23
4.6	EMPLOYMENT	24
5	LAND AT COURTHOUSE FARM, COPTHORNE.....	25
5.1	INTRODUCTION	25
5.2	LOCATION AND SURROUNDINGS	25
	Site Proposals.....	26
	Site Opportunities and Constraints.....	26
6	LAND AT FIRS FARM, COPTHORNE	29
6.1	INTRODUCTION	29
6.2	LOCATION AND SURROUNDINGS	29
	Site Proposals.....	31

Site Opportunities and Constraints	31
7 SUMMARY	32
7.1 COMMENTS ON DRAFT DISTRICT PLAN	32
Policy DPH4	32

Appendices

- 1 – Ecological report
- 2 – Further ecological report
- 3 – Landscape & Visual Appraisal
- 4 – Transport overview
- 5 – Feasibility Plan
- 6 – Care home plan

1 INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This consultation response has been prepared by DHA Planning and is submitted on behalf of Option Two Development Ltd in response to the Mid Sussex District Council ("MSDC") District Plan (Regulation 19) consultation, which runs until 23rd February 2024.
- 1.1.2 We understand that Mid Sussex District Council (MSDC) is in the process of reviewing and updating the District Plan to set out a strategy for development for the period up to 2039, and that the Council is asking for views on principles that should determine where homes should be built, and how the Council can deliver infrastructure improvements across Mid Sussex.
- 1.1.3 These representations relate to Options Two's interests at **Courthouse Farm, Copthorne** ('site A') and **Firs Farm, Copthorne** (site 'B'). Both sites have previously been promoted for residential development as part of the 'Site Allocations DPD', and were also promoted as part of the Regulation 18 Consultation in 2022 for residential development and/or specialist older persons housing.
- 1.1.4 Although these sites were not selected for allocation, the Council is now having to plan to meet its additional housing requirements and requires additional housing sites. Courthouse Farm and Firs Farm are suitable and deliverable sites that can meet the local identified need in the Copthorne, as well as supporting shorter-term needs of the district.
- 1.1.5 Therefore, these representations are made in the context of our client's sites in order to promote the land as alternative sites for inclusion within the District Plan.
- 1.1.6 This report considers the draft policies of the Plan, in comparison with the Regulation 18 Plan, before assessing the planning case for both sites as a potential allocations.

2 STRATEGIC BACKGROUND

2.1 CURRENT DISTRICT PLAN STRATEGY

- 2.1.1 The adopted District Plan focuses development towards the three main towns (Burgess Hill, East Grinstead and Haywards Heath). This spatial strategy informed the location of allocations within the District Plan and subsequent Site Allocations DPD.
- 2.1.2 The Copthorne Neighbourhood Plan 2021-2031 does not make any housing allocations in addition to the those included in the Local Plan.

2.2 DISTRICT PLAN REVIEW

- 2.2.1 Table 2a of the District Plan Review (was Table 1a in Regulation 18 document) sets out the following components of housing supply within Copthorne.

COMMITMENTS (AS OF 1 ST APRIL 2023)	DISTRICT PLAN ALLOCATIONS	2021-2039	TOTAL HOUSING SUPPLY 2021-2039
260	1,500		1,760

TABLE 2.1: EXTRACT FROM MID SUSSEX DISTRICT PLAN REVIEW TABLE 2A

- 2.2.2 The proposed District Plan Review allocation referred to above is Land at Crabbet Park, Copthorne, which is allocated for 2,000 homes (1,500 of which is hoped to come forward during the plan period) under policy DPSC2 of the Regulation 19 Local Plan. The Land at Crabbet Park was allocated for 2,300 homes in the Regulation 18 version of the Local Plan under Policy DPSC3.
- 2.2.3 Whilst in Copthorne & Worth ward, the proposed allocation has little connection with Copthorne itself, being separated from it by several fields. The proposal is effectively an extension to Crawley, albeit separated by the M23. Furthermore, the draft masterplan for Crabbet Park shows very little development at this western edge, closest to Crawley, meaning that in reality the development would be a largely isolated settlement which does not relate well to any surrounding settlements.

3 EVIDENCE BASE

3.1 INTRODUCTION

- 3.1.1 The District Plan Review is accompanied by an evidence base which comprises a mixture of new background documents, and previous documents prepared in support of the adopted District Plan and Site Allocations DPD.
- 3.1.2 Our first comment is to stress that it is vital that the evidence base is refreshed in its entirety for this strategic review of the Council's development plan.
- 3.1.3 This need not require new or updated versions of each piece of evidence to be prepared, but evidence must be put forward to explain how the evidence base as a whole has been reviewed, and how it remains relevant to the current strategic framework. Not only should the evidence base be renewed, but also it should remain under constant review, taking into account changing circumstances.

3.2 SUSTAINABILITY APPRAISAL

- 3.2.1 The District Plan Review is accompanied by a Sustainability Appraisal (SA) prepared by JBA Consulting dated November 2023. This is an update to the previously submitted SA for the Regulation 18 stage, dated October 2022.

Overall Strategy

- 3.2.2 The Regulation 18 stage SA appraised two spatial options, which were summarised as:
- Option 1 – maintaining the existing spatial strategy of the District Plan, with proportionate levels of growth across the settlements and the main settlements accommodating greater levels of growth.
 - Option 2 – growth to support the sustainability potential of the smaller settlements.
- 3.2.3 The updated SA published at Regulation 19 attempts to assess five spatial options, which are now summarised as:
- Option 1 – maintaining the existing spatial strategy of the District Plan, with proportionate levels of growth across the settlements and the main settlements accommodating greater levels of growth.
 - Option 2 – growth to support the sustainability potential of smaller settlements.

- Option 3 – Creating a new sustainable settlement.
 - Option 4 – Focus development in the three towns.
 - Option 5 – Prioritise development on brownfield land
- 3.2.4 The Regulation 19 states that the conclusions for Options 1 and 2 made by Lepus are largely still relevant, however some amendments have been made to the original assessment in light of increased understanding of these options.
- 3.2.5 Somewhat surprisingly, the conclusions still remain uncertain to an extent. Spatial Option 1 is found to perform better in relation to some aspects of social and economic sustainability, however uncertainty still remains in the deliverability of identified housing need and this may lead to adverse social impacts in the long term.
- 3.2.6 Spatial Option 2 is still stated as providing greater certainty in relation to the delivery of the identified housing need. This Option is stated to perform better in relation to some aspects of environmental sustainability, however there is now uncertainty in relation to some environmental aspects such as energy and waste and water resources and there is potential for a new point to lead to greater need to travel to meet daily needs and fewer sustainable travel choices, with associated increases in GHG emissions and impacts on climate change.
- 3.2.7 Turning to the newly presented options, Option 3 is stated as having certainty in relation to the delivery of identified housing need, albeit less than Option 2, however there are uncertainties in relation to aspects of social impacts and environmental sustainability as it could lead to less sustainable travel choices and the associated greenhouse gas emissions through increased energy usage during construction and occupation of a new settlement.
- 3.2.8 Spatial Option 4 is stated as performing better in terms of economic, social and some environmental impacts, however, is uncertain when it comes to the delivery of identified housing need.
- 3.2.9 Spatial Option 5 is also stated as uncertain when it comes to housing delivery, however, provides greater certainty for other social and economic impacts, with some uncertainty remaining around environmental impacts such as biodiversity and landscape.

Assessment of Site A (Firs Farm) and Site B (Courthouse Farm)

- 3.2.10 Our client's sites are not considered in the Sustainability Appraisal because they were rejected at stage 2(a) of the SHELAA process. This will be discussed further later in these representations.

Assessment of Crabbet Park

- 3.2.11 The draft District Plan Review proposes a single housing allocation at Copthorne, albeit not connected to the village itself. This in the form of a large strategic allocation at Crabbet Park. Draft Policy DPSC2 allocates this site for 2,000 homes (reduced from 2,300 at the Regulation 18 stage), 1,500 of which would be delivered during the emerging plan period.
- 3.2.12 This area comprises site 18 as assessed in the SA and SHELAA.
- 3.2.13 In order to meet the sustainability levels set out in the SA, the new development is reliant on a significant amount of infrastructure this includes:
- The provision of a **new neighbourhood centre**;
 - New **community facilities and employment space**;
 - Sustainable transport measures including a **transport hub and improved cycling and walking links**; and
 - A new **all-through school** with 3FE at primary school (reg 18 version was 2FE) and 4FE at secondary level (expandable to 6FE).
- 3.2.14 The SA also raises specific issues in relation to the Crabbet Park strategic allocation, including:
- The introduction of 2,000 new dwellings would be expected to lead to **increased energy consumption and waste generation**;
 - The Landscape Capacity Study noting that the local landscape has a **low landscape capacity for development**;
 - The development would result in the loss of 20ha of **best and most versatile agricultural land**.
- 3.2.15 In the previous SA for the Regulation 18 stage, it was noted that the proposed allocation would have a high negative impact on the nearby listed buildings. The Regulation 19 SA downgrades this to a 'minor' negative impact on the basis Policy DPSC2 now requires heritage information to be included in the planning submission; however it does not make any specific provisions in relation to the nearby listed buildings it remains likely that the introduction of 2,000 dwellings would harm the setting of these.
- 3.2.16 A comparison of the relevant SHELAA findings is set out in Section 4.3 of these representations.

4 RESPONSE TO THE DRAFT DISTRICT PLAN – GENERAL TOPICS

4.1 HOUSING

Residual Need, Housing Supply and Trajectory

- 4.1.1 The Local Housing Need (LHN) for housing is 19,620 dwellings (an average of 1,090 dwellings per annum). This figure is 522 dwellings less than the requirement set out in the Regulation 18 Stage Consultation Local Plan.
- 4.1.2 The figures have been updated and reflected the latest, 2023 figures, rather than the 2022 figures presented in the Regulation 18 version. As of 1st of April 2023, there were 9,921 commitments made up from planning permissions and development plan allocations that have yet to be implemented, in addition, there were 2,240 completions in the first two years of the plan.
- 4.1.3 MSDC allocates 7 'Sustainable Community' sites to deliver 5,243 homes within the plan period (up to 2039). This is an increase from the Regulation 18 version which proposed 3 'Sustainable Community' sites to deliver 4,750 homes within the plan period.
- 4.1.4 The 'Sustainable Community' Sites include the Land at Crabtree Park which accounts for 1,500 dwellings in the plan period.
- 4.1.5 The Council's Housing supply components are consolidated within Draft Policy DPH1 and set the residual requirement at 7,459 dwellings, which is 710 dwellings less than that set out within the Regulation 18 stage.
- 4.1.6 Through the 'Sustainable Community Sites' an additional 493 dwellings have been accounted for in the allocations in Policy DPH1 to meet the above residual figure.
- 4.1.7 The draft District Plan proposes to deliver 20,616 dwellings over the Plan period, which is an increase of 996 dwellings above the housing target, which when compared with the Regulation 18 consultation is a significant increase above the housing target, but just 172 dwellings over what could have been delivered through the Regulation 18 policy.

Proposed Strategy

- 4.1.8 The District Plan Review proposes to meet the Local Housing Need figure of 1,090 dwellings per annum, and we support the conclusion that there are no exceptional circumstances to justify departure from this.

- 4.1.9 We note that a Housing Topic Paper and a Duty to Co-operate Paper still remain absent in this stage of the Plan Review. This raises concern given that the District Plan had to accommodate significant unmet need from Crawley. The adopted District Plan at Policy DP5, also recognises that Crawley's Local Plan finishes a year before the Mid Sussex and Horsham plans.
- 4.1.10 Indeed, the unmet need across Sussex and surrounding areas is only increasing, most notably along the coastal authorities. Worthing Borough Council, for instance, have very recently adopted a Local Plan with a very significant shortfall of 10,488 homes across the plan period. This shortfall must be met, otherwise this will result in a very significant level of unmet housing need in West Sussex.
- 4.1.11 In terms of East Sussex, Lewes, Eastbourne, Rother and Wealden District Councils are all unable to demonstrate a five-year housing land supply. Eastbourne is at an early stage with its new Local Plan and none of the others have local plans coming forward at this time. Therefore, there is a very significant level of unmet need across East Sussex. Both sites detailed within these representations present an opportunity to provide housing to meet this need in a cross-boundary location. An allocation of this site would significantly boost opportunities to comply with the Duty to Co-operate.
- 4.1.12 Whilst it is acknowledged within the District Plan Review that the Duty to Co-operate is an ongoing process, it is concerning that no strategy has been set out yet to accommodate unmet need from nearby authorities.
- 4.1.13 With regard to the spatial strategy, it is noted that Copthorne is identified as having High Growth Potential. Rather oddly, this is referred to here as Copthorne (Crabbet Park) – following the representations made on the Regulation 18 Stage, there remains no assessment of Copthorne as a whole, and none of the other strategic allocations are separated out from their nearest settlements in the same way (e.g. Sayers Common). Since Crabbet Park is, currently, an isolated group of fields, it is not at all clear how such a conclusion could be reached in relation to Crabbet Park whilst remaining silent about the growth potential of Copthorne in general.
- 4.1.14 The settlement hierarchy for the district is set out at Table 1 of the District Plan Review which identified Copthorne as a 'Larger village' which is second in the hierarchy to the main towns of Burgess Hill, East Grinstead and Haywards Heath. Larger villages are identified as local service centres providing key services in the rural area, it is noted that these settlements serve the wider hinterland and benefit from a "good range of services and facilities" such as employment opportunities and access to public transport.
- 4.1.15 It remains clear in the Regulation 19 District Plan that Copthorne is a sustainable location for growth. Furthermore, the allocation of land at Firs Farm and Courthouse Farm which would constitute proportionate and appropriate growth; the District Plan Review does not propose any development at Copthorne itself,

preferring to allocate a new settlement which is poorly related to Copthorne Village, and is separated from neighbouring Crawley by a motorway.

- 4.1.16 Land at the above sites should be allocated for development more sustainable alternatives, which actually meet the overall strategic plan objectives.

Comments on Draft Policy DPH1 (Housing)

- 4.1.17 As noted above, this strategy would seek to meet the majority of the Council's residual housing need through strategic urban extension at locations which have not previously been considered suitable for growth.
- 4.1.18 Indeed, we have some concerns regarding the balance between strategic and non-strategic scale allocations and the anticipated delivery trajectory. For example, as per draft policy DPSC3, 1,500 dwellings allocated in the District Plan are associated with the strategic allocation of Land at Crabbet Park, alongside two other major strategic scale allocations at Sayers Common and west of Burgess Hill. These concerns were raised in the representations submitted for the Regulation 18 version, however the Council have not sought to address these concerns in the Regulation 19 submission.
- 4.1.19 Due to the scale of this significant site allocation, it will also require the delivery of significant supporting infrastructure. These are complex, high-cost items that will not be quick or easy to deliver, including:
- New primary and secondary school facilities;
 - Healthcare provision;
 - Wastewater infrastructure;
 - The creation of community facilities; and
 - The provision of sustainable transport measures and highways improvements
- 4.1.20 In this regard, we would draw the Council's attention to the 2016 document published by Nathaniel Lichfield's and Partners (NLP) - 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver', which provides evidence pertaining to the speed and rate of delivery of large-scale housing, based on a large number of sites across England and Wales.
- 4.1.21 Whilst the NLP report does not represent practice guidance, it is widely accepted as being a reliable and credible source. Figure 4.1 below is taken from the NLP report, which shows the average planning approval period and delivery of first dwelling by site size.

Figure 4: Average timeframes from validation of first application to completion of the first dwelling

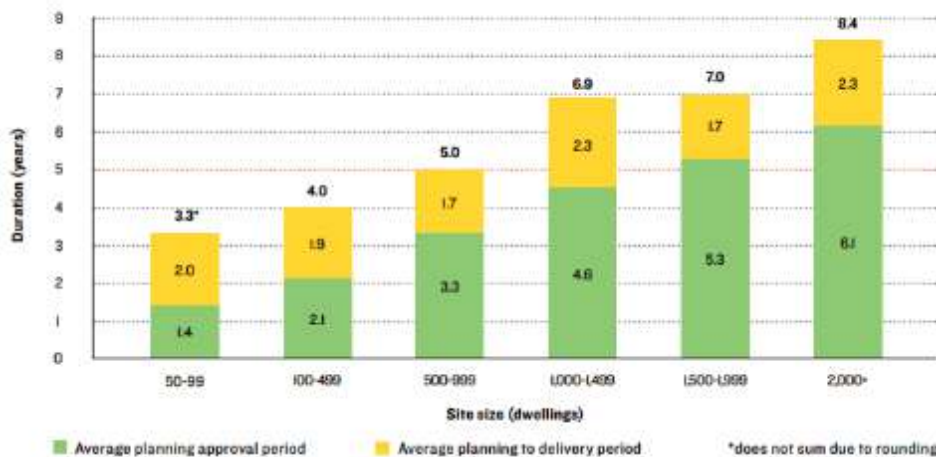


FIGURE 4.1: NLP REPORT TIMEFRAMES FROM VALIDATION TO FIRST DWELLING COMPLETION (FIGURE 4)

- 4.1.22 It identifies that the from the time of submission of a planning application, it can take between 5.0 and 8.4 years for the first home to be delivered on a site. To this end, a strategy dominated by strategic sites brings into question whether the short to medium-term housing needs of the district would be adequately addressed because larger sites, by their nature, will not deliver at the consistent rate required to sustain a five-year supply. Likewise, a mix of too small sites will not have the scope to genuinely mitigate the cumulative impacts on infrastructure and services, including the provision of affordable housing.
- 4.1.23 Paragraph 60 of the NPPF states that to support the Government's objective of significant boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 4.1.24 Accordingly, in the last representations submitted at Regulation 18 stage, we encouraged the Council to allocate medium sized sites, such as land at Firs Farm and Courthouse Farm, that can deliver quickly and require minimal intervention to supporting infrastructure, but still make a meaningful contribution to housing needs. It is now proposed as part of Policy DPH1 to deliver 5,243 dwellings as part of 'Sustainable Communities' strategic sites (Reg 18 version proposed 4,750) and 563 less dwellings on 'medium' sites (1,444 dwellings). The Regulation 19 Local Plan therefore places further reliance on the delivery of these significant site allocations.
- 4.1.25 Whilst site selection must be a balance, in our view the plan as drafted is far too heavily weighted towards strategic sites and provides an inadequate level of smaller sites to feed the small to medium housebuilders that provide such a valuable contribution towards local delivery.

- 4.1.26 To summarise, we are concerned that the strategy is so heavily balanced towards strategic scale development that there is no contingency in place should one or all the sites be subject to unexpected delay. A remedy to this strategy imbalance would be to allocate additional small/medium sized sites in and around existing settlements.

4.2 COMMENTS ON DRAFT POLICY DPSC2 (LAND AT CRABBET PARK)

- 4.2.1 The draft District Plan identifies Copthorne as a Larger Village (Category 2 Settlement) along with 5 others including nearby Crawley Down. These are noted as providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport.
- 4.2.2 Whilst Copthorne is identified as having high growth potential, the only allocation is the strategic site at Crabbet Park, which is a standalone new settlement and which is poorly related to both Copthorne and Crawley, between which it sits. Therefore, we have some concerns regarding the spatial distribution of new allocations.
- 4.2.3 In particular, it is considered that a disproportionate level of growth is directed to the site at Crabbet Park (policy DPSC3) and will result in a sense of coalescence between Crawley and Copthorne.
- 4.2.4 Whilst we have no objections to a strategic site forming part of the overall mix of local plan allocations, to reiterate previous comments, the draft Plan is too heavily weighted on large strategic sites. This in turn fails to reflect that the district is semi-rural and that there is a demand for a greater mix and dispersal of growth. Based on the strategy currently proposed, we are concerned that there will be a significant undersupply of homes in the short to medium term because of the lack of clarity regarding the deliverability of the strategic sites and the imbalance of smaller scale growth.
- 4.2.5 By contrast, development at Firs Farm and Courthouse Farm would represent more proportionate growth at Copthorne.

4.3 THE SITE SELECTION PROCESS

- 4.3.1 The selection of sites within the draft District Plan has been informed by the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA). This forms a pool of sites to assess for their development potential. A Site Selection methodology was established which was then applied to the sites carried forward from the SHELAA. The purpose of this process was to reject sites that were not suitable for development and to identify the most deliverable and developable for allocation. The process involved assessing sites against 14

assessment criteria which encompassed environmental, delivery and sustainability factors.

Assessment of Firs Farm

- 4.3.2 The Firs Farm site has been submitted previously (site 995 and part of size 276) and was submitted by DHA as part of the Regulation 18 stage. The site was not assessed in detail in the SHELAA, having been rejected at Stage 2a whereby the following conclusion was reached:

"The site is disconnected from the defined built-up area and settlement boundary. Development of the site does not meet the requirements of 'achieving sustainable development' (NPPF Chapter 2). The site is therefore considered unsuitable for development and has been excluded from further assessment."

- 4.3.3 Following the submission of the site as part of Regulation 18 the Council noted in the "Response to Omissions Sites" document submitted as part of the Regulation 19 evidence base:

"Comments raised in representation are noted; however, no detailed assessment was undertaken for this site as it was filtered out at early stage, in line with the methodology, due to being considered disconnected from an existing settlement. Should an assessment be undertaken in future then comments could be considered."

- 4.3.4 Similar conclusions were reached in relation other neighbouring sites clustered around the A264/B2028 Dukes Head Roundabout, as shown by the black hatching in Figure 4.2.

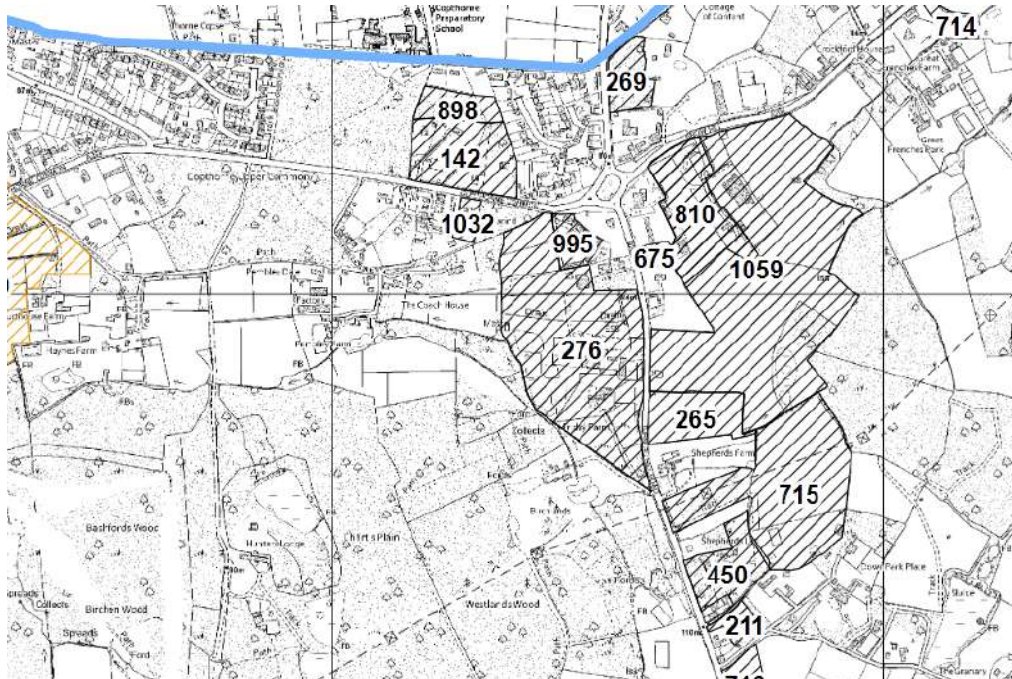


FIGURE 4.2: NEIGHBOURING SITES

- 4.3.5 It is recognised that this location is not adjacent to either the Copthorne or Crawley Down Built Up Area Boundaries and therefore some forms of development here would conflict with current Local Plan policies.
- 4.3.6 However, the same equally applies to Crabbet Park, which has been allocated for development. That has been put forward as a strategic allocation, and somehow passed the SHELAA test, despite clearly failing the same test at Stage 2(a) since it is not contiguous with any Built Up Area Boundary either.
- 4.3.7 It is clear from Figure 4.2 that there could be scope to develop a strategic allocation centred around the Dukes Head roundabout, taking into account the following:
- Whilst Firs Farm (and other neighbouring sites) may not be contiguous with the Built Up Area Boundary (a theoretical policy tool), it is contiguous with existing built development. There is a suburban style estate immediately to the north of the site at Newlands Park, and development all along the southern side of Copthorne Common Road and both sides of Turners Hill Road in this location.
 - In addition to Newlands Park, there are facilities, services and employment opportunities in this area. There is the Dukes Head pub to the south-east of the roundabout, whilst there are employment areas to the south of the site (at Barns Court, which has planning permission to expand further),

and at the extensive Sussex Police Vehicle Workshop and Southdown Buses sites to the east. To the west, along Copthorne Common Road is an Esso garage with shop, Asda collection point, Greggs bakery and Subway, and an Indian takeaway.

- The site is also on regular bus routes, giving it a good level of public transport accessibility.

4.3.8 It should also be noted that whilst this area falls outside the BUAB, there is a clear cluster of development around the Dukes Head roundabout including the Newlands Park residential area to the north, the Dukes Head public house, various industrial and commercial developments including Barns Court to the south (which has planning permission to expand further) and the Sussex Police vehicle workshop. It feels like a built up area, and looks like a built up area to those passing through.

4.3.9 Taking all these points together, the site is clearly a more sustainable location for development than Crabbet Park. Whilst it is recognised that shops, services and schools etc are planned for Crabbet Park, these do not currently exist, and will take time to provide. If any of these services are not provided, or are not provided within a timely fashion, Crabbet Park will be isolated from services and may be to be car-dependent.

4.3.10 Even if development around the Dukes Head roundabout was smaller in scale, rather than a strategic allocation, sites such as Firs Farm are clearly already more sustainable locations for development than the rural fields of Crabbet Park.

Earlier Stage Assessments

4.3.11 The site was assessed more thoroughly in the earlier stage SHELAA assessment.

4.3.12 Site 995 (the eastern section of the site) shown in Figure 4.3 was assessed as having a potential yield of 18 units. It was considered to have the potential to affect the neighbouring listed building, where mitigation may be necessary. Otherwise, safe access was considered to exist and there were no other known constraints. The site was considered to have a reasonable prospect of being developed in the plan period.



FIGURE 4.3: EASTERN SECTION OF SITE (SITE 995)

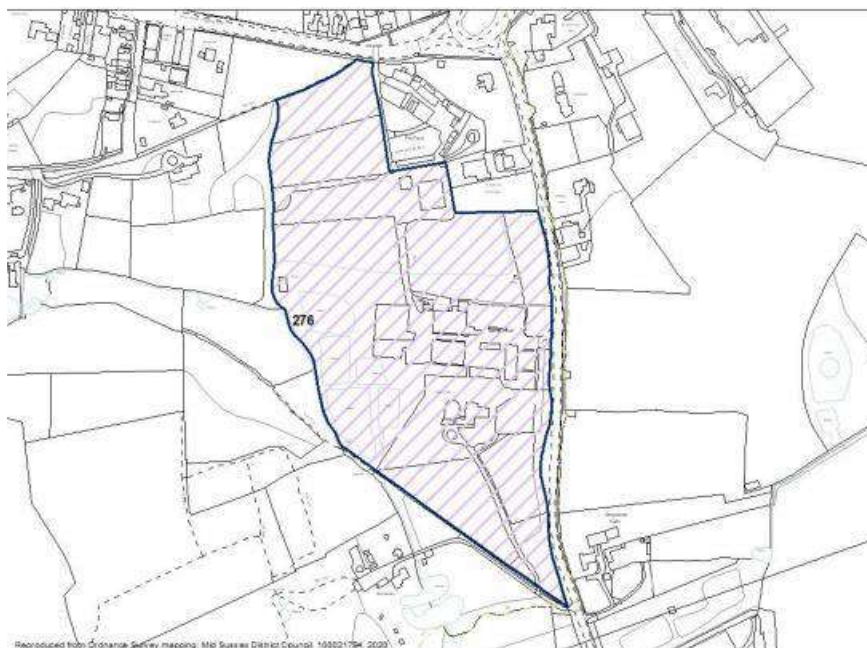


FIGURE 4.4: REMAINING SECTION OF SITE AND LAND TO SOUTH (SITE 276)

- 4.3.13 The remaining part of the site formed part of a much larger area, also including Barns Court (and its expansion land) to the south – site 276. This is shown in Figure 4.4.
- 4.3.14 That area was also considered to have safe access and no known constraints. Again, it was considered there would be a reasonable prospect of development within the plan period.

4.4 ASSESSMENT OF COURTHOUSE FARM

- 4.4.1 Courthouse Farm (site 990) made it through several stages of the SHELAA process but was rejected at Stage 2(c). The following conclusion was reached:

"National Planning Policy gives considerable weight to the protection and enhancement of the natural and historic environment. The site is adjacent to a Local Wildlife Site at Copthorne Common. Development has potential to impact on the Local Wildlife Site with no mitigation identified.

The site is therefore considered unsuitable for development and has been excluded from further assessment"

Quantum of Development

- 4.4.2 It was noted that in the previous SHELLA report, the site was identified as being assessed as having a capacity for 140 dwellings. This was questioned as part of the Regulation 18 representations submitted for this site, which as per the Councils "Response to Omission Sites" document submitted as part of the Regulation 19 evidence base, the amended yield of 100 dwellings is noted.
- 4.4.3 It remains the case, as with the previous submission assessed, that the site could realistically achieve 100 dwellings or alternatively the front part of the site could be developed for a retirement of care home in conjunction with a significant housing element.
- 4.4.4 Previously, it was requested that the site should be reassessed taking into account the actual proposals for the site rather than an artificially high and unrealistic quantum of development, however the Council appear to have "noted" these updates but have not assessed the site appropriately as requested as part of this Regulation 19 Plan.
- 4.4.5 Notwithstanding the above, it is clear that Courthouse Farm scores better than Crabbet Park in many categories as shown in Table 4.1
- 4.4.6 It should also be noted that whilst Crabbet Park scores better in the Primary School, Health and Retail categories, this would only be the case if these facilities were actually delivered within Crabbet Park as planned, which cannot be certain. Furthermore, as per our previous Call for Sites submissions, there is potential for

a mini-supermarket within the Courthouse Farm site and yet this site has not been scored upwards in recognition of this point.

Issue	Courthouse Farm	Crabbet Park
Landscape	Negative	Negative
Flood Risk	Very Positive	Neutral
Trees	Positive	Negative
Biodiversity	Negative	Very Positive
Listed Buildings	Very Positive	Negative
Conservation Areas	Very Positive	Very Positive
Archaeology	Neutral	Very Positive
Availability	Positive	Positive
Access	Positive	Negative
Bus Service	Good	Fair
Train Service	Poor	Poor
Public Transport	Neutral	Neutral
Main Service Centre	Negative	Negative
Primary School	Positive	Very Positive
Health	Positive	Very Positive
Retail	Positive	Very Positive

TABLE 4.1: COMPARISON BETWEEN COURTHOUSE FARM AND CRABBET PARK SHELAA CONCLUSIONS

Biodiversity

- 4.4.7 The proforma at Appendix 3 of the SHELAA report identifies that the site scored "negative" for biodiversity effects. This is said to be on the basis that the site is adjacent to the Copthorne Common Local Wildlife Site. The proforma notes:

"Development on this site has the potential to impact on the LWS. Site contains some tree lined ditches which appear to link to the LWS."

Development on this site has the potential to impact the LWS - no mitigation identified. Further consideration should be given to impacts of increased recreation on the adjacent heathland LWS arising from people and domestic pets, impacts on hydrology resulting from development given the presence of freshwater features, the connectivity between the SHELAA site and the LWS, particularly tree lines. In order to recommend improvements to the LWS we would need to be informed by up to date ecological information. Heathland is an extremely rare habitat and opportunities to improve management and restore good quality heathland should be prioritised"

- 4.4.8 A Preliminary Ecological Appraisal prepared by Lloyd Bore has previously been submitted in relation to the site. The issues raised above were also considered in a further response from Lloyd Bore, dated 27th February 2019 which has also been previously supplied to MSDC .
- 4.4.9 This confirmed that concerns regarding the potential impact on hydrology have been considered in the design of the indicative masterplan layout, and this would be managed through the creation of ecologically designed SuDs to avoid pollution entering water courses. It noted that the illustrative scheme includes a swale to collect, hold and attenuate any excesses of site surface water.
- 4.4.10 Furthermore, regarding connectivity between the site and the LWS (particularly tree lines), it noted that any application would require the removal of some trees from the tree line along Copthorne Common Road to create the site access. It concluded that many of these trees are not of high quality. The masterplanning of the site would allow for achieving a net gain in tree planting, using native species appropriate to local landscape character, reinforcing tree line and connectivity with the LWS from within and across the site.
- 4.4.11 Finally, it is noted that Crabbet Park is also adjacent to a Local Wildlife Site. It is not clear therefore why that site has been scored as having a “Very Positive” impact on biodiversity in contrast to the “Negative” score for Courthouse Farm when it is clear that any impacts can be mitigated at Courthouse Farm.

Landscape Effects

- 4.4.12 The proforma identifies that the site scored “negative” for landscape effects. It appears that this conclusion has been reached on a character area-wide assessment with no reference to the site specific Landscape Appraisal submitted in support of the previous call for sites prior to the Regulation 18 Representations and indeed following the Regulation 18 Representations.
- 4.4.13 A high level Landscape and Visual Appraisal was submitted to MSDC previously and is attached for convenience at **Appendix 3**. This shows that the site is highly visually contained and development would not result in loss of views. There would be no erosion of separation between settlements and it concluded that a well-designed development within a substantially wooded setting would not appear uncharacteristic or out of keeping with the surrounding landscape.
- 4.4.14 It also concluded that development of the site would not result in the loss of or damage to key landscape resources or features, would not introduce uncharacteristic or detracting features into the landscape. It would result in a minor extension in the settlement envelope to the south.
- 4.4.15 Furthermore, the proposed development would not be uncharacteristic of its setting, and would not be of a scale, massing, location or nature that would result in any notable impacts upon the landscape resources that combine to create the prevailing landscape character and a local, regional or national scale.

- 4.4.16 In summary, whilst we recognise that any development of a greenfield site will have some level of landscape impact, there is no landscape reason not to allocate this site.

Comparison with other Copthorne SHELAA Sites

- 4.4.17 There are only two other sites proposed for development which are adjacent to the Built Up Area Boundary for Copthorne, both of which were also rejected at the same SHELAA Stage 2(c). These sites are:
- Site 141: Land at Copthorne Common, immediately north of the Courthouse Farm site; and
 - Site 1094: Land at the Copthorne Hotel.
- 4.4.18 It is noted that Site 141 actually forms part of Copthorne Common and would represent development of a Local Wildlife Site. It is clearly therefore unsuitable for development, as is recognised in the SHELAA.
- 4.4.19 Site 1094 would result in the loss of a hotel, and was rejected in the SHELAA for that reason.
- 4.4.20 With Copthorne unable to be expanded northwards as land there is fully within the Green Belt (and in a neighbouring district in any event), and with Heathy Wood being built out between the western boundary of Copthorne and the M23, it is clear that the only viable options for further expansion of Copthorne is to the south and/or east. With the Copthorne Common LWS preventing development of much of the land to the south of Copthorne Common Road, it is clear that land at Courthouse Farm is the only suitable and viable alternative and it should therefore be allocated for development.

4.5 OLDER PERSONS HOUSING AND SPECIALIST ACCOMODATION

Older Person's Housing Need

- 4.5.1 Over the plan period MSDC have identified that there is an estimated need for 1,887 additional dwellings with support or care and 211 additional bedspaces (net spaces).
- 4.5.2 In order to meet some of this need, MSDC has sought to make provision for older persons' accommodation as part of 4 of the 7 'Strategic Communities' allocations, including Crabbet Park, alongside two specific allocations for older persons' specialist accommodation.

4.5.3 Of the 6 sites identified within the District Plan Review, only 110 bedspaces are specified within the policies, and the remaining policies do not demonstrate a commitment to a specific number to meet the need.

4.5.4 Policy DPH4 (older persons' housing and specialist accommodation) attempts to allow proposals for new developments and states:

"Proposals for new older persons' housing and those with specialist accommodation needs will be supported where all of the following criteria are met:

3. the site is allocated for such use within the district plan, site allocations DPD or Neighbourhood Plan, or the site is located within or contiguous to the Built-Up Area Boundary, as defined on the policies map.

4. the site is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network.

5. the planning application is 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 mode for residents, staff and visitors."

4.5.5 We strongly agree that there is a need for a specific policy to encourage and facilitate the development of older persons housing due to the significant need of this form of development.

4.5.6 It was previously submitted to MSDC as part of the regulation 18 representations that Policy DPH4 (previously DPH26) should be reworded to provide proper flexibility to deliver the identified need. This case remains and criteria 3 of DPH4 should be amended to read:

*"the site is allocated for such a use within the District Plan, Site Allocations DPD or Neighbourhood Plan, or the site is located within **the Built Up Area Boundary or otherwise in a sustainable location, well-related to existing built development.** (change highlighted in bold).*

Policy DPH4

4.5.7 We consider that Policy DPH4 needs to be amended to provide proper flexibility to allow the identified need to be met within the plan period.

4.5.8 As presently drafted, the policy requires potential development sites for specialist housing for the elderly to be located within, or contiguous to (i.e. touching) the Built Up Area Boundary. This significantly limits opportunities to deliver this much needed specialist form of housing.

4.5.9 Due to the nature of this form of development, significant sized development sites can be required, which are not easy to find within development boundaries. This

problem is then exacerbated by the requirement for sites to be contiguous with the BUAB.

- 4.5.10 This is, in practice, very hard to achieve in some settlements such as Copthorne where the BUAB has been drawn in such a way as to prevent any development from being contiguous with much of the BUAB.

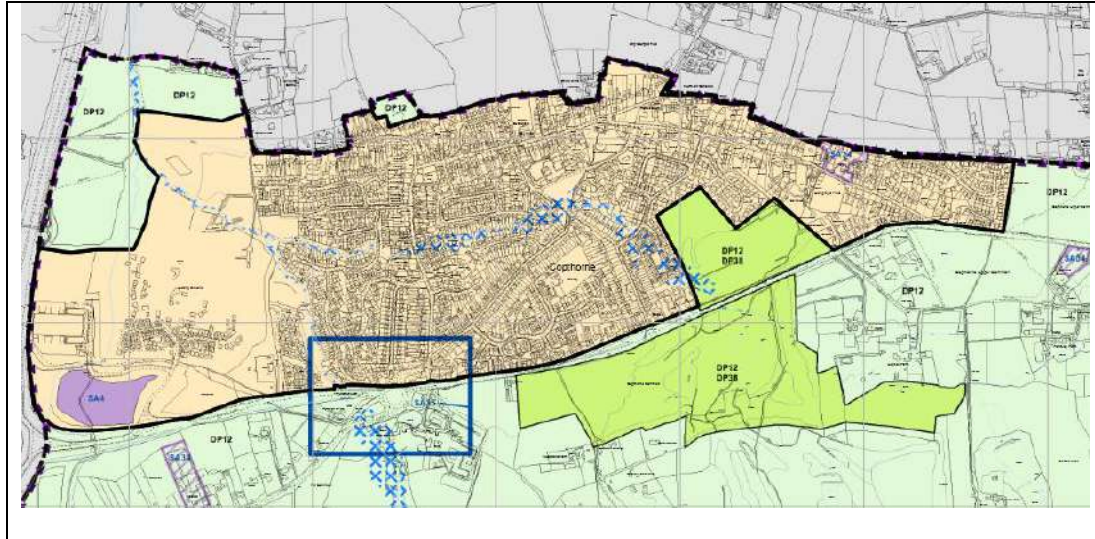


FIGURE 4.1: EXISTING BUAB AT COTHPORNE

- 4.5.11 As shown in Figure 4.1, the western part of the BUAB follows the M23, and most of the southern part follows the northern boundary of the A264, therefore preventing any land to the south being “contiguous” with the BUAB. The only exception on the south side of Copthorne is the protected Local Wildlife Site at Copthorne Common, which is clearly unsuitable for development. The only land to the east of the BUAB is woodland, most of which is identified as Priority Habitat. The vast majority of the northern boundary is also the district boundary, preventing this policy from applying on any contiguous land there, especially since all land to the north is in the Green Belt.
- 4.5.12 As a result of the above, a significant amount of developable land to the south of Copthorne, including Courthouse Farm, is **almost** contiguous with the BUAB, but separated from it by the A264 meaning that it does not fully comply with the policy despite being in a sustainable location. Our proposed amended wording would address this issue, enabling the policy to be more **positively prepared** and **effective**.

Courthouse Farm

- 4.5.13 As noted above, Courthouse Farm, is situated to the south of Copthorne. Whilst it is formally outside of the defined settlement confines of Copthorne it is effectively adjacent to it.
- 4.5.14 As previously set out Copthorne is ranked as one of seen “larger villages” in the Council’s settlement hierarchy, which are secondary focuses for development outside of the three main towns. There are two primary schools within the village and one pre-school. Copthorne also has several shops, pubs /restaurants and community centres which are distributed sporadically throughout the settlement.
- 4.5.15 In terms of connectivity, the closest bus stops are in Copthorne Common Road, circa 400m from the site (‘Abergavenny Gardens’ and ‘New Town’). The stops are served by eight bus routes including: 272, 281, 291, 400, 624, 638, 642 and 648. The bus services provide links to Brighton, Crawley, East Grinstead and Tunbridge Wells as well as the Three Bridges and Horley railway stations.
- 4.5.16 Courthouse Farm is clearly within a sustainable location and Policy DP6 should be reworded to allow for sites within sustainable locations to be bought forward to meet the need identified need for older persons housing and specialist accommodation.

Firs Farm

- 4.5.17 The site lies to the east of the main built up area of Copthorne where some of the main facilities and services can be accessed including employment, leisure, retail, education, and healthcare.
- 4.5.18 As mentioned in the preceding paragraphs, Copthorne is a secondary focus for development outside of the three main towns. MSDC’s previous conclusion on the site recognises that the site is not adjacent to an existing Built Up Area Boundaries, which has been discussed in detail in these representations, however the same equally applies to Crabtree Park which has been identified as a strategic allocation and passed the SHELAA test, despite clearly failing the same test as Firs Farm at Stage 2, since it is not contiguous with any Built Up Area Boundary either.
- 4.5.19 While the Site sits outside of the existing Built Up Area of Copthorne, it sits approximately 550m to the east of it and is surrounded by existing built development on all sides. It is therefore submitted that the site is suitable for specialist older person’s housing to meet the identified need and the rewording of Policy DPH4 should be considered to allow this need to be met on the site.

4.6 EMPLOYMENT

- 4.6.1 Policy DPE1 (Sustainable Economic Development) seeks to meet MSDC's identified sustainable economic development objectives set out in the Council's Sustainable Economic Strategy.
- 4.6.2 Copthorne is identified as a 'larger village' and is the secondary focus for development and acts as a 'local service centre'.
- 4.6.3 MSDC in 2022 allowed an outline application for the land to the south of the site for the expansion of the existing Barns Court commercial estate with up to 7,310 sqm of new commercial space.
- 4.6.4 Given the proximity of the site to a motorway junction, the demand for additional employment land, and taking into account the characteristics of the area around the Dukes Head roundabout, Firs Farm would be suitable and deliverable for employment use, as an alternative to residential or specialist residential uses.

5 LAND AT COURTHOUSE FARM, COPTHORNE

5.1 INTRODUCTION

- 5.1.1 As noted in these representations, land at Courthouse Farm has been previously promoted through the previous Site Allocations DPD, and the 2021 Call for Sites and has been assessed through the SHELAA. The Council therefore already holds information on the site, but for convenience, we repeat the main points below.

5.2 LOCATION AND SURROUNDINGS

- 5.2.1 Courthouse Farm comprises 4.3 hectares of undeveloped grazing land on the south side of Copthorne Common Road, Copthorne. The site is located outside of the defined settlement confines of Copthorne, which extend north of Copthorne Common Road either side of the Golf Course up to the shared boundary with Tandridge District Council.
- 5.2.2 The site is in flood zone 1 and there are no heritage assets nearby that would be affected by development. The nearest is 'Tye Cottage', a Grade II listed dwelling on the opposite side of Copthorne Common Road, circa 90m from the site frontage at the north west corner. The site is adjacent to the Copthorne Common Local Wildlife Site ("LWS"), which covers Copthorne Golf Course. Immediately east of the site there is a cluster of seven residential properties and to the south east several farm buildings associated with Courthouse Farm.
- 5.2.3 Copthorne is ranked as one of seven 'Larger Villages' in the Council's settlement hierarchy, which are a secondary focus for development outside of the three main towns (Burgess Hill, East Grinstead and Haywards Heath). There are two primary schools within the village and one pre-school. The village also has several shops, pubs/restaurants and community centres, which are distributed sporadically throughout the settlement.
- 5.2.4 The surrounding area is residential, characterised by a mix of terraced, semi-detached and detached properties in a suburban layout. The majority of the settlement extends north of Copthorne Common Road; however, there is development to the south of it too, including to the south east of our client's land and next to the roundabout that links Copthorne with the M23 and Crawley.
- 5.2.5 In terms of connectivity, the closest bus stops are in Copthorne Common Road, circa 400m from the site ('Abergavenny Gardens' and 'New Town'). The stops are served by eight bus routes including: 272, 281, 291, 400, 624, 638, 642 and 648. The bus services provide links to Brighton, Crawley, East Grinstead and Tunbridge Wells as well as the Three Bridges and Horley Railway Stations.
- 5.2.6 The site is also well connected to the strategic road network via the nearby M23.

Site Proposals

- 5.2.7 The site was originally put forward as part of the 'Call for Sites' process in April 2019 supported by a Preliminary Ecological Appraisal, Transport Overview and Feasibility Plan. Representations were subsequently made at the Regulation 18 and 19 stages of the Site Allocations DPD and the site was resubmitted for the 2021 Call for Sites. Representations were also made on the Regulation 18 stage of the MSDC District Plan in 2022.
- 5.2.8 For completeness, the submitted feasibility plan is included at **Appendix 5** to illustrate how around 100 dwelling could be delivered on the site whilst retaining trees and hedges. An alternative proposal has also been put forward as a pre-application enquiry for the front part of the site for a two-storey residential care home and a single storey retail unit together with associated access, parking, landscaping and infrastructure, as shown on the plan at **Appendix 6**.
- 5.2.9 It is submitted as part of these representations that a care home at the front of the site alongside residential on the remainder of the site is deliverable on this site.

Site Opportunities and Constraints

- 5.2.10 The sites opportunities and constraints have been detailed as part of the previous submissions therefore the Council are well aware, however for completeness these are detailed below.
- 5.2.11 Copthorne is a secondary focus for development outside of the three main towns and the site is adjacent to the built confines, which extend north of Copthorne

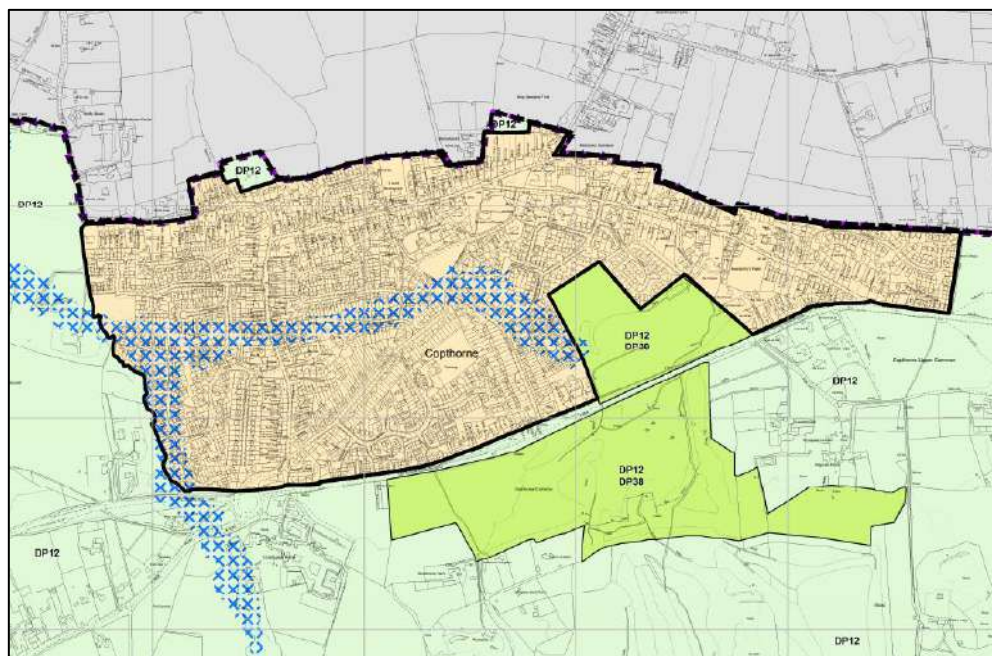


FIGURE 5.1: EXTRACT OF THE MID SUSSEX PROPOSALS MAP – COPTHORNE INSET

Common Road. The scale of development proposed (100 dwellings) would also be proportionate to the size of Copthorne.

- 5.2.12 The wider settlement is constrained by Green Belt to the north of the village (within the adjoining Tandridge district) and there is already development being delivered to the west of the settlement at Heathy Wood. As such, our client's land represents one of the few remaining areas where sustainable and meaningful growth can be delivered without compromising the character of the settlement.
- 5.2.13 The site is adjacent to the Copthorne Common LWS, which is also a managed commercial golf course; however, evidence shows that potential recreational impacts can be adequately mitigated by providing informal open space and semi-natural grassland within the site (see the previously submitted ecological evidence at **Appendices 1 and 2**). Further, the transport overview (**Appendix 4**) demonstrates that the proposal would unlikely result in a severe impact on the local highway network and concludes that safe and suitable means of access could be achieved from Copthorne Common Road, in the form of a ghost island priority junction.
- 5.2.14 Option Two appointed Lloyd Bore to undertake a Landscape and Visual Appraisal. The appraisal was first sent to the Council in February 2020 and made the following conclusions in respect of the site's ability to accommodate development.
- *"Whilst the Appraisal site is technically in countryside and therefore subject to Policy DP12, its character is strongly influenced by the neighbouring golf course, which surrounds it to the north, west and south, and by the busy A264. It is also heavily contained by tree belts to the south, to the extent that visually it has a stronger connection with the A264 corridor than the open countryside to the south of the golf course." (4.38)*
 - *"If there is to be development located in this area, this is potentially a good candidate site as it can accommodate residential development in an accessible location without damaging key landscape and visual characteristics. Furthermore, predicted impacts can be easily mitigated on this site as it possesses a strong landscape structure of boundary hedgerows and trees, that can be retained, reinforced and protected" (8.15).*
 - *"The work undertaken above, although by necessity high level at this stage in the planning process, considers the suitability and capacity of this individual site to accommodate development, based on its own (landscape and visual) merits, rather than judgements based on the much broader characteristics of an entire landscape character area" (8.16).*

- *"The creation of a well-designed development within a substantially wooded setting would not appear uncharacteristic or out of keeping with the surrounding landscape" (8.17)*
- *"The development would not result in the loss of or damage to key landscape resources or features, would not introduce uncharacteristic or detracting features into the landscape. It would result in a minor extension of the settlement envelope to the south" (8.18).*
- *"The proposed development would not be uncharacteristic of its setting, and would not be of a scale, massing, location or nature that would result in any notable impacts upon the landscape resources that combine to create the prevailing landscape character at a local, regional or national scale" (8.19).*

5.2.15 This Landscape Visual Appraisal is included as **Appendix 3**.

5.2.16 Accordingly, detailed information has been submitted to address the site's landscape capacity to accommodate development and potential impacts on the LWS. However, it does not appear that this information has been properly taken into account to date.

5.2.17 In summary, representations have been submitted to the Council to demonstrate that it is available for development, suitable and deliverable.

6 LAND AT FIRS FARM, COPTHORNE

6.1 INTRODUCTION

- 6.1.1 As noted above, Firs Farm has been previously promoted through the Call for Sites.

6.2 LOCATION AND SURROUNDINGS

- 6.2.1 The site lies to the east of the main built up area of Copthorne where some of the main facilities and services can be accessed including employment, leisure, retail, education, and healthcare.
- 6.2.2 The site falls outside of any major planning policy designation such as the Metropolitan Green Belt or Area of Outstanding Natural Beauty (AONB). It sits outside but close to the defined Development Boundary of Copthorne and is therefore currently designated as the countryside for the purposes of planning policy.
- 6.2.3 The site comprises of two subsections separated by a private access road. The western subsection is an undeveloped area of paddocks and grazing. The eastern subsection contains the Firs Farm business which includes three separate dwellings, stables, and areas of hardstanding. The Firs, a Grade II listed building, is located to the northeast of the site, between the site and the roundabout.



FIGURE 6.1: AERIAL VIEW OF THE SITE

- 6.2.4 Figure 6.1 shows that the site is adjoined by elements of existing built form on all sides. As referred to above, to the east is an existing residential property (The Firs) which is Grade II listed. To the north opposite the site entrance is the A264 and across the road to the north is additional residential development. To the north west is a small triangular parcel of undeveloped land. Finally, to the south is E&R Freight, a freight business which is used to store a number of lorries. This is accessed from the Barns Court access onto Turners Hill Road. Also to the south is Dukes Barn from where there is a used car sales forecourt operational 7 days a week, and accessed from Firs Farm
- 6.2.5 Taken as a whole, the site is bounded by mature planting on its west and north boundaries and more sporadic planting on its east and south boundaries. At the time of writing, the only trees on the site covered by a Tree Protection Order (TPO) are those on the north boundary of the western subsection of the site (Ref: WP/07/TPO/87). The site is currently accessed by a private road from the northern boundary off the A264 (Cophthorne Common Road).
- 6.2.6 The Site falls within the Cophthorne Neighbourhood Plan Area.

Relevant Nearby Proposals

- 6.2.7 The Site falls within the Cophthorne Neighbourhood Plan Area.

Relevant Nearby Proposals

- 6.2.8 As set out in the preceding sections of these representations, Planning permission was granted in July 2022 for the expansion of the Barns Court commercial estate to the south of the site, with up to 7,310 sqm of new commercial space.¹ Dukes Barn, to the south of the site, has been converted into a second hand car dealership which operates 7 days a week via the Firs Farm access road.
- 6.2.9 Planning permission was also granted on appeal for a 64-bed care scheme at Chapel Lane, to the north of the Dukes Head roundabout.² In deciding that appeal, the Inspector noted at paragraph 26 that whilst outside the Built Up Area Boundary, the site was “by no means isolated from existing housing” and that bus services are available along the A264 (i.e. close to the Firs Farm entrance).
- 6.2.10 Whilst an Inspector considering a 2017 appeal on the Firs Farm site had previously acknowledged that bus services were available, but felt people would be put off from using them due to the busy road corridor, the Chapel Lane Inspector considered there was no evidence that the buses would not be likely to be used.

¹ DM/20/4127

² APP/D3830/W/21/3281350 – see **Appendix 1**

Site Proposals

- 6.2.11 There are no detailed proposals for the site at this stage, but it is anticipated that the site would be suitable for residential development and/or specialist older persons' housing for which there is an identified need.
- 6.2.12 The site may also be suitable for commercial use in connection with employment land to the south which is discussed in Section 4 of these representations.

Site Opportunities and Constraints

- 6.2.13 The sites opportunities and constraints have been detailed as part of the previous submissions therefore the Council are well aware, however for completeness these are detailed below.
- 6.2.14 Copthorne is a secondary focus for development outside of the three main towns and the site is adjacent to the built confines, which extend north of Copthorne Common Road. The scale of development achievable on this site would also be proportionate to the size of Copthorne.
- 6.2.15 The wider settlement is constrained by Green Belt to the north of the village (within the adjoining Tandridge district) and there is already development being delivered to the west of the settlement at Heathy Wood. As such, development at Firs Farm represents a suitable area for development where sustainable and meaningful growth can be delivered without compromising the character of the surrounding area.
- 6.2.16 The site is located in Flood Zone 1, which has the lowest risk of flooding.
- 6.2.17 The site is not located within a protected landscape.
- 6.2.18 The site benefits from an access point on the northern boundary off of the A264. This is currently a private road serving Firs Farm. SHELAA (Ref: 995) notes that "safe access to the site already exists".
- 6.2.19 In summary, representations have been submitted to the Council to demonstrate that it is available for development, suitable and deliverable.

7 SUMMARY

7.1 COMMENTS ON DRAFT DISTRICT PLAN

Policy DPH4

- 7.1.1 For the reasons set out in these representations, the current wording is considered to be inflexible and is therefore **unsound** because it is not positively prepared or fully effective.
- 7.1.2 We propose the following amendment to the wording:
- "the site is allocated for such a use within the District Plan, Site Allocations DPD or Neighbourhood Plan, or the site is located within **the Built Up Area Boundary or otherwise in a sustainable location, well-related to existing built development.**" (change highlighted in bold).*
- 7.1.3 Furthermore, the plan should make greater provision for specialist housing for the elderly, with both Courthouse Farm and Firs Farm being suitable locations for this use for the reasons set out in this statement.
- 7.1.4 My client wishes to participate at the oral examination in order to discuss these points.

APPENDIX

2





- 1B4P- Aff Apartment
- 2B3P- Aff Apartment
- 2B4P-Aff
- 3B5P-Aff
- 3B5P-Mkt
- 3B6P-Aff
- 3B6P-Mkt
- 3B6P-Porch
- 4B8P-Aff
- 4B8P-Mkt

- Development Site
- Root protection zones
- Badger Sett protection zone

Proposed Accommodation Schedule					
Occupancy	Affordable	Area per Type	Total Unit Count	Total Area	Comments
1B4P- Aff Apartment	Affordable	51.4 m ²	4	205.8 m ²	2 Storey Flats
2B3P- Aff Apartment	Affordable	68.7 m ²	4	274.7 m ²	2 Storey Flats
2B4P-Aff	Affordable	73.6 m ²	15	1104.4 m ²	
3B5P-Aff	Affordable	94.2 m ²	8	753.2 m ²	
3B5P-Mkt	Private	94.2 m ²	27	2542.1 m ²	
3B6P-Aff	Affordable	117.1 m ²	3	351.3 m ²	
3B6P-Mkt	Private	117.1 m ²	16	1873.7 m ²	
3B6P-Porch	Private	124.2 m ²	2	248.4 m ²	
4B8P-Aff	Affordable	141.1 m ²	3	423.4 m ²	
4B8P-Mkt	Private	141.1 m ²	4	564.3 m ²	
Grand total			66	8341.5 m ²	

Parking Schedule-Master	
Comments	Parking-Quat
Affordable	48
Private	106
Visitors	12
	166

REV	DATE	DESCRIPTION	CHK
M	01.08.25	Garages omitted, parkings adjusted and plots 44-46 moved to avoid RPA of trees T27 and T28	
L	25.07.25	Plots around Badger Sett omitted and re-arranged	
K	10.07.25	Adjustmentys made to observe critical tree protection area	PT
J	30.06.25	Amendments made to co-ordinate with tree locations	PT
I	26.06.25	Revised to relocate play area. Additional houses types added.	PT
H	19.06.25	RPA comments assessed. Pumping Stations re-positioned	PT
G	16.06.25	Pumping Station and Pond relocated	PT
F	13.06.25	Tree protection areas added	PT
E	12.06.25	Pumping Station added	PT
D	10.06.25	Works in progress	PT
C	21.05.25	Area schedule updated	PT
B	16.05.25	Revised Scheme	PT
A	30.04.25	First Issue	PT

jane duncan
architects+
interiors

The Old Warehouse
Chalfont Station Road
Little Chalfont, Amersham
Bucks HP7 9PN
+44 (0)1494 766 999
info@janeduncanarchitects.co.uk
janeduncanarchitects.co.uk

CLIENT
Option Two Development Ltd

ADDRESS
Cophorne Common Rd
Cophorne, RH10 3LA

PROJECT
Court House Farm, Cophorne

DRAWING TITLE
Option D - 100% Residential

DRAWING NO.
ECF485_101

REV
M

SCALE
1:500

DATE
30.04.25

DRAWN
BB

CHECKED
PT

0m 10m 20m 30m 40m 50m
Drawing Scale 1:500



- 1B2P
2B3P-Terrace
2B4P
2B4P-Above Pavilion
3B6P
- Development Site
Root protection zones
Badger Sett protection zone

Proposed Accommodation Houses				
Occupancy	Area per Type	Total Unit Count	Total Area	Comments
1B2P	60.8 m ²	4	243.4 m ²	2 Storey Apps
1B2P	62.7 m ²	2	125.4 m ²	2 Storey Apps
1B2P	63.8 m ²	2	127.7 m ²	2 Storey Apps
1B2P	89.4 m ²	6	536.4 m ²	2 Storey Apps
1B2P	71.1 m ²	2	142.2 m ²	2 Storey Apps
2B3P-Terrace	63.9 m ²	14	894.6 m ²	Ground Floor
2B4P	88.3 m ²	2	176.7 m ²	2 Storey Apps
2B4P	89.6 m ²	6	537.6 m ²	2 Storey Apps
2B4P	89.8 m ²	24	2155.2 m ²	2 Storey Apps
2B4P	182.9 m ²	2	365.8 m ²	2 Storey Apps
2B4P	92.3 m ²	4	369.2 m ²	2 Storey Apps
2B4P	92.8 m ²	6	556.8 m ²	2 Storey Apps
2B4P	95.8 m ²	2	191.6 m ²	2 Storey Apps
2B4P	97.2 m ²	2	194.4 m ²	2 Storey Apps
2B4P-Above Pavilion	136.6 m ²	9	1229.4 m ²	Above Pavilion
3B6P	109.2 m ²	2	218.4 m ²	2 Storey Apps
3B6P	110.8 m ²	2	221.6 m ²	2 Storey Apps
3B6P	113.1 m ²	4	452.4 m ²	2 Storey Apps
3B6P	113.6 m ²	4	454.4 m ²	2 Storey Apps
3B6P	114.4 m ²	2	228.8 m ²	2 Storey Apps
Grand total		101	9119.5 m ²	

Parking Schedule-Master	
Comments	Parking-Quat
Private	61
Service Parking	2
Visitors	11
	74

P1	30.09.25	Building design updates across all blocks	
I	01.08.25	Parking area amended to avoid 128	PT
H	25.07.25	Plots around Badger Sett omitted and re-arranged	PT
G	10.07.25	Adjustments made to observe critical tree protection area	PT
F	19.06.25	RPA comments assessed	PT
E	16.06.25	Pumping Station and Delivery access reconfigured	PT
D	12.06.25	Pumping Station added	PT
C	10.06.25	Works in progress	PT
B	16.05.25	Revised Scheme	PT
A	02.05.25	First Issue	PT
REV	DATE	DESCRIPTION	CHK

jane duncan architects+ interiors

The Old Warehouse
Chalfont Station Road
Little Chalfont, Amersham
Bucks HP7 9PN

+44 (0)1494 766 999
info@janeduncanarchitects.co.uk
janeduncanarchitects.co.uk

CLIENT
Option Two Development Ltd

ADDRESS
Cophorne Common Rd
Cophorne, RH10 3LA

PROJECT
Court House Farm, Cophorne

DRAWING TITLE
Option C - Retirement Village

DRAWING NO.
ECF485_110

REV
P1

SCALE
1 : 500

DATE
02.05.25

DRAWN
BB

CHECKED
PT

