

Local Plan modifications representation

FPLPM599552792

Crawley Local Plan

Part A personal details

Title	Mr.
First name	Richard
Last name	Morton
Organisation	retirement housing group
Is the address	Outside Crawley, or not found
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Has a planning agent been appointed?	No

Part B your representation

Which document would you like to make a representation on?	Crawley Borough Local Plan Main Modifications
Enter the Main Modification reference number that this representation relates to	mm30 and mm41
Which policy or paragraph in the Local Plan does this representation relate to?	Policy
Please give details using the Schedule of Main Modifications	H5
Legally compliant?	No
Sound?	No
Please give details explaining your response	RHG is concerned that the proposed mods seek affordable housing from residential institutions and that they have not been evidenced by the Council's own viability study
Please set out what modification(s) you consider necessary to resolve the issues you have identified above	We draw on comments from 2 RHG members, Charterpoint and McCarthy Stone both of whom have made specific representations re potential amendments to the proposed modifications
Upload any supporting documentation or files	Crawley local plan RHG comments March 2024 final.pdf
Form submitted by:	Mr. Richard Morton on 25/03/2024



Forward Planning,
Crawley Borough Council,
Town Hall,
The Boulevard,
Crawley
RH10 1UZ.

25th March 2024

Dear Sir/Madam

Crawley Local Plan Main Modifications Representations 2024

I am writing to you on behalf of Retirement Housing Group (RHG) to raise concerns expressed by our members relating to modifications MM30 and MM41 to policy H5 of the emerging local plan

RHG does not normally comment on individual local plans. However on this occasion RHG members were deeply concerned that

- the proposed modifications to the local plan seek affordable housing from a type of accommodation (residential care) which is not normally expected to provide affordable housing
- and also seeks 40% affordable housing from all forms of housing and accommodation for older people including C2 uses without regard to the findings from the Council's own viability appraisal

Affordable housing and residential care (C2) accommodation

We consider that there is a fundamental misunderstanding with regard to the different accommodation typologies that fall within Use Class C2 which has resulted in Main Modifications and hence Policy H5 potentially having a very negative impact on delivery of both care homes and Extra Care housing, as well as retirement housing where no care, but only support is provided.

With particular regard to care homes we note points put forward by Stone Planning Services Ltd on behalf of RHG member Charterpoint Group.

RHG objects to the Council introducing an affordable dwelling requirement on C2 Residential Care Homes. All new Residential Care Homes provide residents with a bedroom and en-suite. They do not have space for cooking, recreation, interaction with other residents, exercising etc. They are not dwellings. Meals are cooked in a

central kitchen by staff and served to residents in communal dining areas. C2 Care homes units are essentially bedrooms not separate dwellings. It is therefore quite inappropriate to seek affordable housing from a C2 residential care scheme

Viability appraisal of C2 Extra care housing and residential institutions and affordable housing contributions

RHG member McCarthy Stone has provided detailed comments demonstrating that the viability appraisal carried out by DSP does not provide evidence to support the council's proposed policies.

As I am sure you will be aware the PPG section on viability states

How should plan makers set policy requirements for contributions from development?

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).

These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. . . . Different requirements may be set for different types or location of site or types of development.

See related policy: National Planning Policy Framework [paragraph 34](#)

Paragraph: 001 Reference ID: 10-001-20190509

Revision date: 09 05 2019 See [previous version](#)

Therefore, in order to apply affordable housing the council must have tested the viability of doing so. DSP prepared the plan wide viability study and comment re extra care accommodation:

3.7.24 The typology results representative of extra care development (60 apartments – Table 3j) do not reach viability with 40% AH and the other assumptions used collectively. . . .From experience there may be a grey area in terms of where these sit between or combining care services and housing. There could be a range of scheme types and within these it may be that some schemes would not be required to provide affordable housing in any event, or might be developed or procured in a way that means they make more accessible provision – meeting a range of needs. [Crawley BC LP and CIL Viability Assessment - DSP19682 FINAL REPORT v8.pdf](#)

With regard to residential institutions there is only one specific care home appraisal [FINAL Appendix IIIc - CBC - Commercial Results v4.xlsx \(crawley.gov.uk\)](#) and this

appears to be completely private with no AH inclusion (the rate corresponds with the £175 per week rates in their summary tables.

Therefore, not only is it incorrect to apply the AH target to care homes but no appraisal has been carried out to justify setting an affordable housing target for a care home. With regard to extra care housing, the Council's own viability study has demonstrated that Extra Care cannot meet the full 40% affordable housing requirement.



Richard Morton

Chair,

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