

# Local Plan modifications representation

## FPLPM599482649

### Crawley Local Plan

#### Part A personal details

Title	Mr.
First name	Ian
Last name	Fowler
Organisation	Savills (UK) Limited
Is the address	Outside Crawley, or not found
House name or number	Savills Guildford, 244-246
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Town	Guildford
County	Surrey
Postcode	GU1 3JF
Email	ifowler@savills.com
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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?	Yes
Sound?	No
Please give details explaining your response	<p>Proposing an on-site affordable housing model within a C2 (Care) development is non-functional in practice. This is because the majority of care home developers cannot commit to developing sites without an intended care home operator in mind. There is a very limited pool of care home operators that would be willing to acquire a care home with a need to provide affordable beds on-site. This is as a result of the adverse impact on the financial viability of the care home model which has struggled in recent years. In particular, in the aftermath of the pandemic, rising staff costs and the overheads associated with running a care home have risen disproportionately to the income received per bed. Rising build costs have also played a factor in the deliverability of new care homes. The proposed modifications are also currently unclear for developments that fall outside of the town centre, because the suggested wording implies that off-site contributions will be the method of providing affordable housing for C2 (Care) Use schemes outside the town centre. However, the proposed modifications are contradictory as they also emphasise on-site affordable housing being the default expectation. Prospective purchasers of our client's site, therefore, have struggled to find clarity on what assumptions they should be making in their offers in respect of affordable housing contributions. We urge the council to provide clarity on its stance for C2 (Care) schemes in the Borough, particularly those that fall outside of the town centre. We are of the view that should affordable housing be required on-site on C2 (Care) developments, this would be unnecessarily punitive towards care home operators. Simply put, the proposed modifications risk reducing the amount of care homes that are delivered in the Borough which could be to the detriment of the Borough's residents as the demographics suggest a pressing needs for care accommodation.</p>

Please set out what modification(s)  
you consider necessary to resolve the  
issues you have identified above



**a**

**2 Adopted Policy**



**a**



**a**

**6 Summary**

