

# STATEMENT OF COMMON GROUND ON HOUSING NEED

SECTION 78 APPEAL BY BEEHCROFT DEVELOPMENT LTD

LAND AT CROWELL ROAD, CHINNOR

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004

LPA REF: P21/S0804/0  
PINS REF: APP/Q3115/W/21/3289271

<b>Signed:</b> [REDACTED]	<b>Signed:</b> [REDACTED]
<b>Name:</b> [REDACTED]	<b>Name:</b> [REDACTED]
<b>On behalf of:</b> [REDACTED]	<b>On behalf of:</b> [REDACTED]
<b>Date:</b> 5 April 2022	<b>Date:</b> 5 April 2022

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**1. INTRODUCTION**

- 1.1 This Statement of Common Ground (SoCG) on housing need has been prepared by Pegasus Group and on behalf of Beechcroft Development Ltd (“the Appellant”) in conjunction with South Oxfordshire District Council (“the LPA”). It relates to a planning appeal made pursuant to Section 78 of the Town and Country Planning Act 1990, in respect of the proposed development of up to 54 age restricted dwellings (for people aged 55 and over), including 40% affordable housing and communal facilities, on land to the north of Crowell Road, Chinnor.
- 1.2 The purpose of the SoCG is to identify the areas where the principal parties (the Appellant and the LPA) are in agreement on matters relating to housing need, and to narrow down the issues that remain in dispute. This will allow the Public Inquiry to focus on the most pertinent issues.

## **2. MATTERS NOT IN DISPUTE**

2.1 This section sets out the matters that are not in dispute between the Appellant and the Council.

### **The Development Plan**

2.2 The Development Plan relevant to the appeal proposals includes the South Oxfordshire Local Plan ("SOLP") which was adopted on 10<sup>th</sup> December 2020, and the Chinnor Review Neighbourhood Plan ("CRNP") which was made on 20<sup>th</sup> May 2021.

2.3 It is agreed that as the policies of the CRNP were made more recently than those in the SOLP, where there is any conflict, the policies of the CRNP take precedence as set out in paragraph 30 of the NPPF.

### **The SOLP**

2.4 It is agreed that **Policies H1 and H13** support and encourage the development of schemes for specialist housing for older people in locations with good access to public transport and local facilities.

2.5 It is agreed that the appeal proposals have good access to public transport and local facilities and thereby accord with these policies.

2.6 It is agreed that **Policy H9(1)** requires that 40% of homes should be provided as affordable housing.

2.7 It is agreed that the appeal proposals provide for 40% affordable housing and thereby accord with this part of the policy.

2.8 It is agreed that **Policy H9(2)(iii)** requires a certain tenure mix and that Policy CH H3 of the more recently made CRNP requires that the tenure mix is informed by an assessment of local housing need.

### **The CRNP**

2.9 It is agreed that **Policy CH H5** accords with the SOLP and supports the provision of retirement housing.

2.10 It is agreed that **Policy CH H7** restricts development outside of the settlement boundary except where this accords with Policy H1 of the SOLP.

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- 2.11 It is agreed that the appeal proposals accord with Policy H1 and therefore accord with these policies of the CRNP.
- 2.12 It is agreed that **Policy CH H3** requires that the tenure mix on sites is to be informed by an assessment of local housing need.
- 2.13 It is agreed that this Policy was made more recently than Policy H9 of the SOLP, and that in determining planning applications and appeals, an assessment of local housing need is required by the Development Plan to determine the appropriate tenure mix.

**Five Year Housing Land Supply**

- 2.14 It is agreed that the five year land supply position is unlikely to be material to the appeal, owing to the fact that the parties are agreed that the appeal proposals accord with the Development Plan.
- 2.15 It is agreed that the most recent appeal decision to have concluded on the five year land supply relative to the housing requirement at Ladygrove, found that the LPA was unable to demonstrate a five year housing land supply. It is agreed that Inspectors at two subsequent written appeals at Parkside, Henley-on-Thames and Mulberry House, Henley-on-Thames have taken the same stance as the Inspector at Ladygrove.
- 2.16 It is agreed that if the appeal proposals are allowed this will contribute to the deliverable supply within the next five years

**Affordable housing need**

- 2.17 It is agreed that the SHMA of 2014 identified an estimated net need for 386<sup>1</sup> affordable homes (social rented; affordable rented; and intermediate housing (including shared ownership and shared equity homes)) per annum from 2013 onwards<sup>2</sup>. It is agreed that in the period 2013-21, there has been a cumulative shortfall of in the region of 2,000 affordable homes relative to this need.
- 2.18 It is agreed that there is now an urgent need for affordable housing in South Oxfordshire as set out in paragraph 6.22 of the committee report.

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<sup>1</sup> 331 affordable homes per annum including development pipeline – see Table 55

<sup>2</sup> See Table 54

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2.19 It is agreed that if the appeal proposals are allowed this will contribute to addressing the urgent need for affordable housing, with a focus on shared ownership

**Need for older persons housing**

2.20 It is agreed that there is a need for specialist housing for older people such as that proposed.

2.21 It is agreed that the provision of such housing provides numerous benefits including:

- Enabling residents to live independently for longer;
- Reducing the incidence and severity of injuries experienced by residents;
- Improving the health, wellbeing and quality of life of residents;
- Reducing costs on the health and social care sectors;
- Releasing under-occupied homes for other households.

2.22 It is agreed that if the appeal proposals are allowed this will contribute to addressing the need for older persons accommodation.

**Tenure mix of older persons housing**

2.23 It is agreed that the tenure mix proposed has been informed by the findings of the Three Dragon's Report and data available from the local housing register. "There is no other assessment of local housing need upon which to determine the tenure mix for the purposes of this planning appeal. This does not however prejudice the Council's ability to take into account subsequent evidence when considering other applications and appeals."

2.24 It is agreed that, based on the available evidence, the tenure mix accords with Policy CH H3.

2.25 It is agreed that the appeal proposals commit to the delivery of 1 home for affordable rent and 20 for shared ownership, with a fallback of Discount Market Sales, and that this therefore accords with Policy CH H3.

**3. MATTERS IN DISPUTE**

**Housing Land Supply**

- 3.1 The Appellant considers that the LPA remains unable to demonstrate a five year land supply.
- 3.2 The LPA considers that it is able to demonstrate a 5.33 year land supply for the purposes of paragraph 74 of the NPPF with a surplus of 374 homes.