

LAND AT CROWELL ROAD, CHINNOR

PROOF OF EVIDENCE ON HOUSING NEED AND SUPPLY

ON BEHALF OF BEEHCROFT DEVELOPMENT LTD

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E. EXECUTIVE SUMMARY

Putative reasons for refusal

- E.1 The committee report acknowledged that there is a need for the proposed development and that the appeal site provides an appropriate location to address this need. In this context, the committee report acknowledges that the principle of the proposed development accords with the Development Plan and concludes that “officers consider the proposed development would represent sustainable development, having regard to the policies of the development plan.”
- E.2 The Council nevertheless resolved that had they been the determining authority they would have refused planning permission including owing to the absence of a s106 to secure sufficient affordable housing of a suitable mix, type and tenure in putative reasons for refusal 3 and 4.
- E.3 The Appellant and the Council have continued to work constructively together, and I understand that the parties are now in agreement¹ that the appeal proposals will secure a sufficient and suitable mix of affordable housing and thereby they accord with the policies of the Development Plan in this regard, such that putative reasons for refusal 3 and 4 will not be maintained by the Council².

The scope of this evidence

- E.4 Notwithstanding the agreed position between the Council and the Appellant, the Inspector will now determine the appeal. The following Proof of Evidence is provided to assist the Inspector and demonstrates that the appeal proposals accord with or are supported by the relevant parts of Policies H1, H9 and H13 of the SOLP and with Policies CH H2, CH H3, CH H5 and CH H7 of the CRNP.
- E.5 It is understood that the only substantive matter in dispute between the parties is the ability of the Council to demonstrate a 5YLS in accordance with paragraph 74 of the NPPF. This is likely to be academic to the determination of the appeal providing the Inspector agrees with the parties that the appeal proposals accord with the Development Plan. It is nevertheless addressed, as it may be material to the need/requirement for housing and/or to the approach to determining the

¹ I understand this will be agreed in a Statement of Common Ground but this has yet to be signed.

² Nor as I understand it will any of the other putative reasons for refusal.

appeal if the Inspector finds that the appeal proposals do not accord with the Development Plan when read as a whole.

Policy Context

- E.6 National policy sets out the Government objective to significantly boost the supply of housing (paragraph 60). This is supported by the requirements of national policy to:
- a. Facilitate a sufficient amount and variety of land to come forward to meet the needs of groups with specific requirements (paragraph 60) including older people and those in need of affordable housing which are to be assessed and reflected in Development Plan policies (paragraph 62); and
 - b. Maintain a 5YLS of deliverable housing land (paragraph 74) to ensure that the needs reflected in policies are responded to.

Overall housing need (including 5YLS)

- E.7 We are in the midst of a national housing crisis with households nationally needing to spend 9.05 times the average income to access an average priced property. In South Oxfordshire, this position is far more pronounced with households being required to spend 13.07 the average income to access an average house. This means that for a significant proportion of households, housing is simply unaffordable as mortgage lenders typically offer to lend between c.4 and 4.5 times income.
- E.8 This has arisen as a result of the desperate disparity between the need for and supply of housing which is evident nationally and in South Oxfordshire. Government policy indicates that the solution to this is to significantly boost the supply of housing.
- E.9 Where a 5YLS is unable to be demonstrated the tilted balance of paragraph 11d of the NPPF is engaged. In addition, the absence of a 5YLS also provides an indication of the sufficiency of supply to address the housing requirement in the immediate five-year period, which may be material to the weight afforded to policies and the requirement to increase the supply to restore a 5YLS.
- E.10 The SOLP however contains a stepped housing requirement such that the housing requirement does not meet housing needs in the short-term. The 5YLS position

does not therefore provide an indication of the need for housing. It is therefore also appropriate to consider the 5YLS position against the housing need as this will be determinative of the need (rather than requirement) for additional housing in the immediate five year period.

E.11 Recent appeal decisions have found and proceeded on the basis that the Council is unable to demonstrate a 5YLS against the housing requirement and no newly arising evidence has become available to indicate that a 5YLS now exists. The tilted balance of paragraph 11d is therefore engaged³. Indeed, having reviewed the position, as progress has not been forthcoming on numerous sites, the 5YLS position against the housing requirement is now materially lower than set out in recent appeal decisions with a **4.08yls and a shortfall of 1,057 homes**. There is therefore a need for a substantial increase in the deliverable supply to restore a 5YLS for the purposes of paragraph 11d, and this may be material to the weight afforded to the policies and the need to boost to the supply to meet the housing requirement in the immediate five year period.

E.12 Additionally, on the basis of the Council's position or mine, the Council is unable to demonstrate a 5YLS against the housing need by a substantial margin with either a **4.35yls and a shortfall of 905 homes** or a **3.33yls and a shortfall of 2,336 homes**. On either basis there is clearly a pressing need (in addition to the requirement) for additional housing now which will be material to the weight afforded to the provision of housing.

The need for affordable housing

E.13 There is a substantial backlog of affordable housing need with a **shortfall of either 1,060 or 1,199 affordable homes** having accrued since 2013 against the need identified in the SHMA. The Council acknowledge that there is an "urgent" need for such housing and this need will be material to the weight afforded to the provision of affordable housing.

E.14 This "urgent" need for affordable housing is addressed in Policy H9(1) of the SOLP with which the appeal proposals are agreed to comply by providing 40% affordable housing.

³ Noting that this will not be material to the determination of this appeal if it is concluded that the appeal proposals accord with the Development Plan.

The need for older persons accommodation

- E.15 National guidance acknowledges that there is a “critical” need for specialist accommodation for older people and this has been established in a recent appeal decision in South Oxfordshire, the assessment prepared in support of the planning application and is also demonstrated in the following Proof of Evidence. Both the SOLP (Policy H1 and H13) and CRNP (Policy CH H5), with which the appeal proposals comply, support and encourage the provision of such accommodation.
- E.16 The committee report identifies that the appeal site provides an appropriate location to respond to this need.

The need for different tenures and mixes of older persons accommodation

- E.17 Numerous national studies have identified that there is an imbalance of older persons accommodation with an over-supply of rental units and an under-supply of units for sale (including intermediate and discounted sales). The analysis prepared in support of the planning application and that set out within this Proof of Evidence demonstrate that this is also the case in South Oxfordshire.
- E.18 The updated assessment provided in this Proof of Evidence demonstrates that there is a need for either 0 or 1 rental homes as part of the appeal proposals.
- E.19 Therefore, the appeal proposals have been designed to provide 40% affordable housing in accordance with Policy H9 of the SOLP, all of which is to be provided as intermediate housing with the exception of 1 home which is to be provided as affordable rent to reflect this assessment of local needs in accordance with Policy CH H3 of the CRNP. It is understood that this mix is agreed as being compliant with the Development Plan by the Council.

The benefits arising

- E.20 The appeal proposals provide much-needed housing which will contribute to:
- a. improving the accessibility of the market in South Oxfordshire;
 - b. restoring a 5YLS for the purposes of paragraph 11d; and
 - c. meeting housing needs.

- E.21 The appeal proposals provide 40% affordable housing and will thereby contribute to addressing the substantial backlog and urgent need for such housing.
- E.22 The appeal proposals also respond to the critical need for housing for the older population, which has numerous social, health and economic benefits including:
- a. Supporting older people to live independently for longer;
 - b. Reducing the risk of falls amongst the older population;
 - c. Supporting the health, wellbeing and quality of life of the older population;
 - d. Creating communities and thereby reducing the potential for loneliness and depression as well as supporting more active lifestyles amongst the older population;
 - e. Reducing health and social care costs; and
 - f. Making more effective use of the existing dwelling stock by releasing under-occupied housing for use by families.
- E.23 Numerous Inspectors have considered the benefits arising from such proposals and found that many of these benefits in isolation should be afforded at least significant weight.

1. BACKGROUND

- 1.1 My name is Neil Tiley. I am an associate member of the Royal Town Planning Institute and have worked in the private sector for over seven years. I currently hold the position of Director having previously been an Associate Director and before that a Principal Planner at Pegasus Group.
- 1.2 Prior to this I was employed in Local Government for 11 years, including as a Planning Manager at Wiltshire Council for 5 years; as a Senior Planner at Wiltshire County Council for 2 years; as the Demographer at Wiltshire County Council for 2 years; and as a Senior Research Assistant responsible for monitoring and analysing housing completions and undertaking demographic modelling for 2 years.
- 1.3 I have a wealth of experience in assessing housing land supply, having been responsible for the production of such assessments and acting as an expert witness at the majority of housing land supply appeals in Wiltshire over the period 2009 to 2014. I have continued to regularly act as an expert witness dealing specifically with housing need and supply matters for Pegasus Group.
- 1.4 I have significant experience in modelling household need gained in my time as a Demographer and subsequently through preparing and addressing assessments of housing need during my time with the Council and subsequently.
- 1.5 The evidence which I have prepared and provide for this appeal (APP/Q3115/W/21/3289271) is true and has been prepared and is given in accordance with the guidance of my professional institution irrespective of by whom I am instructed, and I confirm that the opinions expressed are my true and professional opinions.

2. INTRODUCTION

- 2.1 This Proof of Evidence relates to a planning appeal for the erection 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. The appeal proposals will not provide care services but will provide some support to enable residents to live independently including an estate manager. As such, the proposals would be defined as retirement living or sheltered housing in terms of the PPG (63-010).
- 2.2 The committee report acknowledged that there is a need for the proposed development and that the appeal site provides an appropriate location to address this need. In this context, the committee report acknowledges that the principle of the proposed development accords with the Development Plan and concludes that "officers consider the proposed development would represent sustainable development, having regard to the policies of the development plan."
- 2.3 The Council nevertheless resolved that had they been the determining authority they would have refused planning permission including owing to the absence of a s106 to secure sufficient affordable housing of a suitable mix, type and tenure in putative reasons for refusal 3 and 4.
- 2.4 The Appellant and the Council have continued to work constructively together, and I understand that the parties are now in agreement that the appeal proposals will secure a sufficient and suitable mix of affordable housing and thereby they accord with the policies of the Development Plan in this regard, such that putative reasons for refusal 3 and 4 will not be maintained by the Council⁴.
- 2.5 The overall need for housing, the need for specialist housing for older people, and the need for affordable housing will nevertheless be material to the benefits provided by the appeal proposals. Similarly, the appropriate tenure mix to be provided on specialist housing in Chinnor will be material to the compliance of the appeal proposals with Policy CH H3 of the CRNP. As such these are all addressed within this Proof of Evidence to assist the Inspector.

⁴ Nor as I understand it will any of the other putative reasons for refusal.

3. POLICY CONTEXT

The Development Plan

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 3.2 The Development Plan that applies for the purposes of this appeal includes the South Oxfordshire Local Plan (SOLP) which was adopted on 10th December 2020; and the Chinnor Review Neighbourhood Plan (CRNP) which was made on 20th May 2021. As the CRNP is more recently adopted, the policies in this part of the Development Plan would take precedence over those in the SOLP as set out in paragraph 30 of the NPPF and Section 38(5) of the Planning and Compulsory Purchase Act.

The South Oxfordshire Local Plan (SOLP)

- 3.3 Policy STRAT1 of the SOLP identifies that development proposals will be assessed using national policy and guidance and the whole of the Development Plan and should be consistent with numerous criteria including supporting and enhancing the social dependencies between towns and villages; and supporting and enhancing the roles of Larger Villages including Chinnor.
- 3.4 Policy STRAT2 sets a minimum housing requirement for 23,550 homes over the period 2011 to 2035 including 18,600 to meet the needs of South Oxfordshire and 4,950 to address a proportion of the unmet needs of Oxford City. The policy also steps this housing requirement to provide for 900 homes per annum (hpa) from 2011-26, 1,120hpa from 2026-32 and 1,110hpa from 2032-35.
- 3.5 The objectively assessed need to which Policy STRAT2 responds arises from the Oxfordshire Strategic Housing Market Assessment of 2014⁵ (SHMA) (CD2.1). This assessment identifies a need for 386 affordable homes per annum (ahpa)⁶ which was supported by the examining Inspector⁷.

⁵ As set out in paragraphs 3.21 to 3.25.

⁶ In addition to the unmet affordable housing needs of Oxford City.

⁷ See paragraph 229 of the Inspectors Final Report.

- 3.6 Policy H1 supports (amongst other things) the development of schemes for specialist housing for older people⁸ in locations with good access to public transport and local facilities.
- 3.7 Policy H13 similarly encourages developments that make provision for specialist housing for older people in these locations. The examining Inspector found that it was necessary to modify Policy H13 through the removal of the proposed requirement to identify a local need, in order for the policy to be sound⁹. It is therefore clearly the case, that when considering the need for such accommodation, this does not need to be limited to local needs.
- 3.8 The SOLP recognises in the supporting text to Policy H13 that housing and health are inextricably linked and the value of living in a suitable home in a sustainable location becomes even more important as people get older. In order to address this, it notes that full encouragement will be given to such schemes on sites close to public transport and local shops and facilities.
- 3.9 Policy H9 requires that 40% of homes should be provided as affordable housing on sites of 10 or more homes.
- 3.10 Policy H9 also identifies that the Council will expect a mix of 40% affordable rent, 35% social rent and 25% other affordable routes to home ownership. Paragraph 4.44 explains that this tenure mix provides a starting point and that the precise mix will be agreed through negotiation with the developer. Policy H9 was informed by the SHMA which considered the tenure mix for all housing but did not consider the tenure mix for older persons accommodation specifically. It is nevertheless applicable to all forms of housing, including specialist accommodation for older people, notwithstanding that it is not based on an assessment of the tenure mix needed in such homes. The tenure mix sought by Policy H9 has however been superseded by the more recently adopted Policy CH H3 of the CRNP.

The Chinnor Review Neighbourhood Plan (CRNP)

- 3.11 Policy CH H5 supports the provision of retirement housing or care provision in response to the increasing need for housing provision for the elderly in Chinnor as recognised in paragraph 4.17.

⁸ Including retirement living or sheltered housing such as that proposed.

⁹ See paragraph 242 of the Inspectors Final Report.

- 3.12 Policy CH H7 restricts development outside of the settlement boundary except where this accords with Policy H1 of the SOLP, and thereby supports the provision of specialist housing for older people in such locations.
- 3.13 The CRNP sets out in paragraph 4.25 that it is supportive of the development of affordable housing given the recognition in paragraph 4.14 that there is a need for additional affordable housing in Chinnor.
- 3.14 Policy CH H3 requires that the tenancy mix of proposals for residential development should, where appropriate, have regard to local housing need. The Basic Conditions statement (CD1.5) submitted alongside the CRNP confirms that this is to secure the necessary types of housing and paragraph 4.15 of the supporting text of the CRNP confirms that this local housing need should reflect the need for rent, shared ownership and for sale to local people. It also recognises that this mix of housing is particularly required to address the fact that young people brought up in Chinnor move away because they are unable to meet their needs within the settlement. This policy of the CRNP therefore requires that the mix of housing reflects local needs rather than seeking a standardised mix as Policy H9(2)(iii) of the SOLP seeks to do. As the CRNP was adopted more recently, this takes precedence over Policy H9 and as such it is appropriate to consider the local need for housing to determine whether proposals comply with the housing mix sought by the Development Plan.
- 3.15 The committee report (CD8.1) correctly acknowledges that the proposed development would represent sustainable development having regard to policies STRAT1, STRAT2, H1, H2, H4, H13, CH H5 and CH H7 in paragraph 6.10. From the collaborative work subsequently undertaken with the Council it is now understood that it is agreed that the appeal proposals also comply with policies H9, CH H2, CH H4 and the NPPF such that putative reasons for refusal 3 and 4 (and any other putative reasons for refusal) will not be maintained by the Council.

Material Considerations

The National Planning Policy Framework (NPPF)

- 3.16 Paragraph 60 of the NPPF sets out how the Government's objective to significantly boost the supply of housing will be achieved, including by identifying a sufficient amount and variety of land to address the needs of groups with specific requirements.

- 3.17 Paragraph 62 requires that the housing need for different groups (including older people and those in need of affordable housing) are assessed and reflected in planning policies.
- 3.18 Paragraph 74 requires Local Planning Authorities (LPAs) to identify a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing (a 5YLS) against their adopted housing requirement where this is less than five years old.
- 3.19 Paragraph 11d and footnote 8 identify that where an LPA is unable to demonstrate a 5YLS the policies which are most important for determining an appeal should be considered to be out-of-date and planning permission should be granted unless:
- i. The application of specific policies in the NPPF provide a clear reason for refusal, or
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 3.20 The extent of any shortfall or surplus in the 5YLS may also be material to the weight afforded to policies and the supply of housing¹⁰.

Planning Practice Guidance (PPG)

- 3.21 Within the PPG, there are whole sections devoted to 'Housing supply and delivery' and 'Housing for older and disabled people' to which reference will be drawn as appropriate. The latter section identifies amongst other things that:

"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems..." (63-001)

¹⁰ As set out in paragraph 52 of the Court of Appeal Judgment of *Hallam Land Management Ltd vs Secretary of State for Communities and Local Government et al* [2017] EWHC 2865 (Admin).

“...The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people...” (63-003)

“...The future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ (Strategic Housing for Older People Analysis Tool), which is a tool for forecasting the housing and care needs of older people...” (63-004)

“Decision makers should consider the location and viability of a development when assessing planning applications for specialist housing for older people. Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.” (63-016) (emphasis added)

The Market Assessment of Housing Options for Older People

- 3.22 The Market Assessment of Housing Options for Older People (CD2.2) was prepared on behalf of Shelter and the Joseph Rowntree Foundation in 2012. Paragraph 8 states inter alia:

“There is very limited choice for older person households moving home to accommodate their support needs...Compared with older person’s existing housing tenure (around 70% owner-occupation), there is much less specialist housing available for purchase (around 30%) than for social rent.”

The Oxfordshire SHMA

- 3.23 In addition to the overall need for housing and the need for affordable housing which are explicitly responded to in the SOLP and the examining Inspectors Report, the SHMA (CD2.1) also identifies in Table 75 that there is a need for

somewhere between 1,309 and 2,094 additional specialist homes for older people in South Oxfordshire¹¹, or between **65 and 105hpa**.

- 3.24 The SHMA similarly recognises the need for older persons accommodation for sale rather than for rent, stating:

“...there is a much higher level of supply in the affordable sector than for market housing whereas the majority of older person households are owner-occupiers. This would suggest moving forward that a greater emphasis could be placed on market specialist provision than has been the case in the past.”

The Oxfordshire Market Position Statement 2019-2022 (OMPS)

- 3.25 The County Council published the OMPS (CD2.3) in December 2019. It addresses the needs for extra care housing and care homes but does not specifically address the need for retirement living or sheltered housing. However, it does identify on page 14 that the County Council encourage the development of such accommodation as this will suit the needs of many Oxfordshire residents.
- 3.26 The OMPS has an Extra Care Housing Supplement (ECHS) (CD2.4) which similarly does not address the need for retirement living or sheltered housing, but nevertheless identifies that one of the aims over the next five years is to increase the supply of other forms (i.e. not extra care) of retirement housing recognising that a diverse range of products is required for the population.
- 3.27 The EHCS similarly recognises the imbalance of older persons accommodation in the rental sector compared to sales sector in the first paragraph of section 7 which states:

“The current balance is approximately 70% rental and 30% shared or outright ownership. We expect that schemes will increasingly have a higher percentage of sales in recognition of the fact that currently over 75% of older Oxfordshire residents are home owners.”

Summary

- 3.28 There is a clear and consistent message from national policy, local policy and a range of evidence-based documents, that as part of the overall need for housing

¹¹ Excluding registered care homes which are addressed separately from paragraph 8.36 of the SHMA onwards.

there is a critical need for housing suitable for older persons. In particular, these documents recognise that:

- The older population will increase significantly such that there will be a far greater need for such accommodation;
- Such provision is necessary to provide choice so that the older population can access accommodation that best suits their particular needs which vary significantly;
- The policies of the Development Plan respond by encouraging and supporting the provision of such accommodation¹²;
- The provision of such accommodation will have numerous benefits including:
 - To the health and wellbeing of the older population and their quality of life;
 - Allowing older people to live independently for longer;
 - Enabling older people to remain in their community and to establish relationships with others in a similar situation;
 - Freeing up much needed accommodation for younger households to remain in the settlement;
 - Reducing costs on health and social care as a result of the beneficial effects on the health and wellbeing of residents.

3.29 The available evidence demonstrates that there is a pressing need for affordable housing generally. However, both national and local evidence suggest that there is an imbalance in the availability of different tenures of specialist housing for older people with a greater supply of affordable and particularly social and affordable rental homes compared with a greater need for homes available for sale (including intermediate and discounted market accommodation).

¹² Including Policies H1 and H13 of the SOLP and Policy CH H5 of the CRNP.

4. OVERALL HOUSING NEED AND SUPPLY CONTEXT

The national housing crisis

- 4.1 The national housing crisis is well documented and evidenced in a vast array of documents, including in relation to its causes, its implications and the necessary response as briefly described below.
- 4.2 The housing crisis has arisen largely as a result of the discrepancy between the number of homes built and the need arising from the increasing number of households.
- 4.3 The Barker Review in 2004 identified that there was a need to build circa 250,000 homes per annum to prevent spiralling house prices and a shortage of affordable homes. However, in the period 2004 to 2012, an average of only 178,000 homes per annum were built.
- 4.4 The former NPPF was introduced in 2012 containing the Government objectives to significantly boost the supply of housing and to meet objectively assessed housing needs. However, in the period from 2012 to 2021, an average of only 196,000 homes per annum were built.
- 4.5 As a result of the continued shortfall against the need identified in the Barker Review, the housing crisis has deepened. The Select Committee on Economic Affairs to the House of Lords identified that the need for housing had increased and that there was a need to deliver 300,000 homes per annum in the Building More Homes report, July 2016. This number has been repeatedly confirmed as being needed by the Government in the Budget 2018, the Technical Consultation on Updates to National Planning Policy and Guidance, October 2018, Planning for the Future, March 2020 and the White Paper, August 2020. The balance of need and supply is presented graphically in Figure 4.1 and the cumulative shortfall is presented in Figure 4.2 below.

Figure 4.1 – a comparison of need and supply nationally

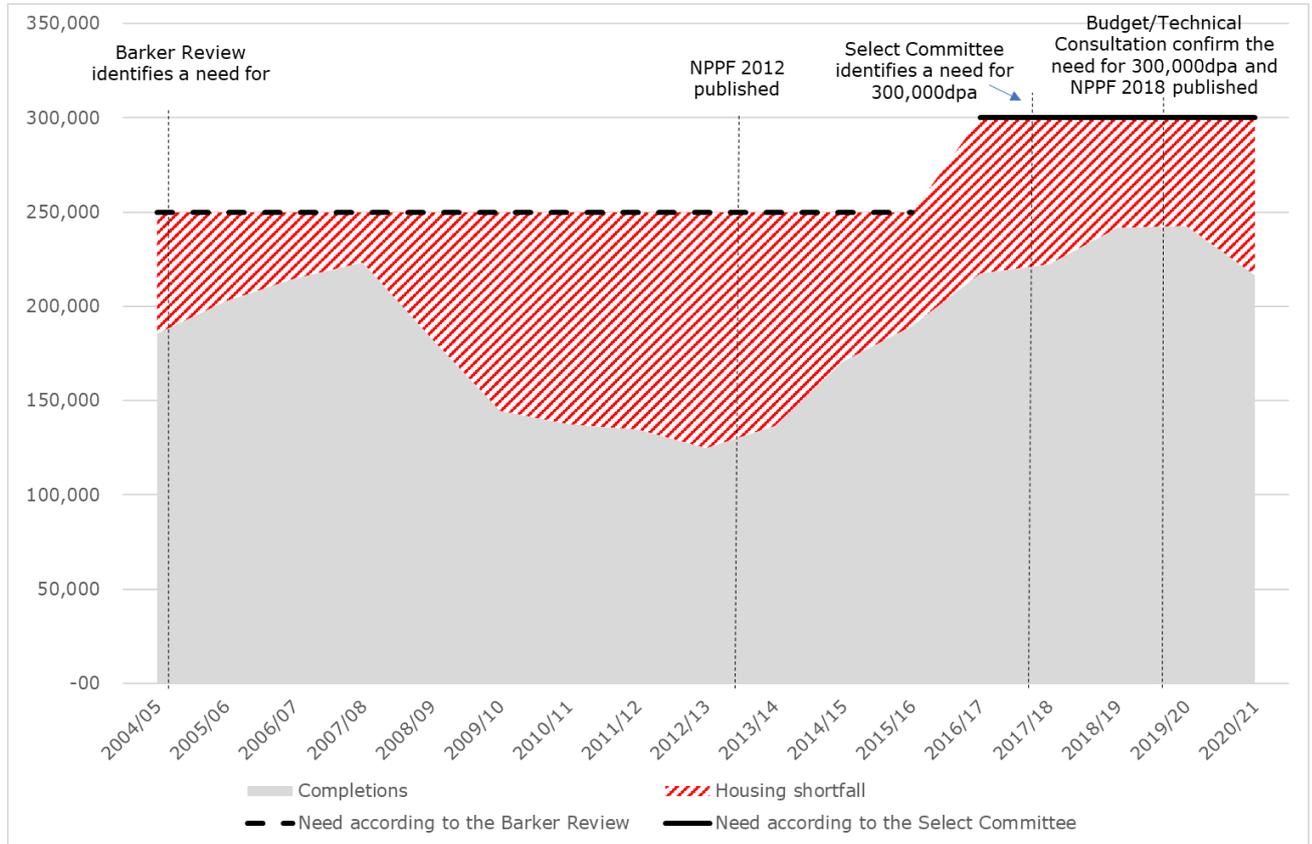
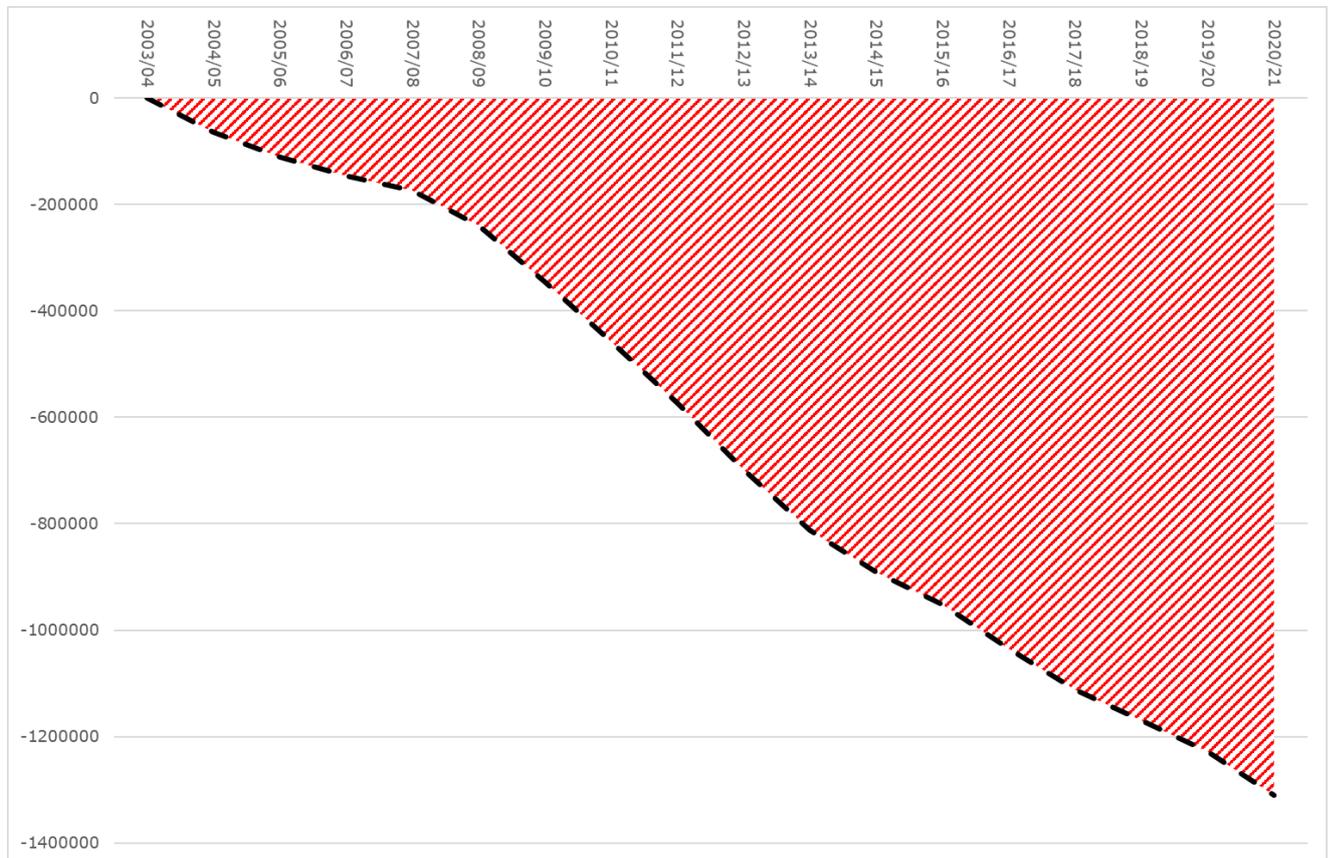


Figure 4.2 – the cumulative shortfall



4.6 This demonstrates that housing supply nationally has not come close to meeting needs over the previous 15 years in any single year and also illustrates the cumulative shortfall in housing supply. Indeed, since 2004 there have been a total of 3,188,961 completions as compared to a need for 4,250,000 based on the need for 250,000 identified in the Barker Review. This equates to a shortfall in the delivery of over a million homes in 17 years.

4.7 As housing need has significantly exceeded the supply, the greater competition for those houses that do exist has had an uplifting effect on the average price of properties with adverse implications on the accessibility of the housing market to households. There are many statistics which demonstrate the decreasing accessibility of the market including (but not limited to):

- i. The lower quartile house price to lower quartile earnings ratio increased from 6.27 to 8.04 from 2004 to 2021 in England according to MHCLG;

- ii. The median house price to median earnings ratio increased from 6.60 to 9.05 from 2004 to 2021 in England according to MHCLG;
- iii. The average house price across the UK increased from £139,027 in 2004 to £231,644 in 2021 according to Nationwide;
- iv. The percentage of overcrowded households has increased from 2.5% to 3.5% from 2004 to 2020 in England according to MHCLG;
- v. The number of concealed families has increased from 161,254 in 2001 to 275,954 in 2011 across England according to the Census; and
- vi. The number of households living in shared dwellings has increased from 65,998 in 2001 to 77,955 in 2011 across England according to the Census.

4.8 It is clear that housing supply was not meeting housing need under the former NPPF with significant adverse effects on accessibility. These effects manifest themselves in real households facing real difficulty and often being unable to access appropriate housing. At a national level, households need to spend 9.05 times median workplace earnings to access a median priced house, which is acknowledged as representative of a housing crisis.

4.9 In response, the Government published the current NPPF in 2018¹³. This seeks to continue to significantly boost the supply of housing in order to address the continued under-delivery of housing and the existing backlog in housing supply through a number of mechanisms including the use of the standard method for calculating the minimum local housing need.

The local position

4.10 South Oxfordshire has experienced similar, if not worse, consequences as a result of the imbalance between housing need and housing supply. The record of delivery is presented in Table A.1 of Appendix 1 which is replicated below for ease of reference.

¹³ Which was then amended to provide additional clarity in 2019.

Table 4.1 – record of delivery

	Completions	Stepped housing requirement	Cumulative surplus/backlog	Housing need	Cumulative surplus/backlog
2011/12	508	900	-392	981	-473
2012/13	475	900	-817	981	-980
2013/14	484	900	-1,233	981	-1,477
2014/15	600	900	-1,533	981	-1,858
2015/16	615	900	-1,818	981	-2,224
2016/17	722	900	-1,996	981	-2,484
2017/18	935	900	-1,961	981	-2,530
2018/19	1,369	900	-1,492	981	-2,142
2019/20	1,477	900	-915	981	-1,646
2020/21	861	900	-954	981	-1,767
TOTAL	8,046	9,000	-954	9,813	-1,767

- 4.11 This demonstrates that there has been a substantial under-delivery of 954 homes against the stepped housing requirement over the plan period to date. Against the need for housing the backlog is even more substantial with some 1,767 households not having been provided the housing they need to date.
- 4.12 In 2022, South Oxfordshire has a median house price to earnings ratio of 13.07, meaning that on average a household would need to spend over 13 times its annual income to access an average house, as compared to 9.05 times nationally.
- 4.13 To put this in context, the standard method of the Government identifies that an uplift to the housing need is required where the median house price to earnings ratio is in excess of 4, inferring that a ratio of 4 is broadly affordable. This aligns with the fact that mortgage lenders typically lend up to between 4 and 4½ times household income, meaning that anything beyond this would render housing unaffordable and inaccessible to a large proportion of households. Ratios of in excess of 13 would therefore clearly undermine the ability of a very large proportion of households to access the housing market and especially those on a lower income.
- 4.14 These ratios are not only startling high on their own, but the ratios in South Oxfordshire are also greater than those which apply in any other part of Oxfordshire or any neighbouring LPA by a significant margin¹⁴. This is illustrative of a particular imbalance between the need for and supply of housing within the LPA.

¹⁴ The closest is in Oxford which experiences a ratio of 12.05.

Summary

- 4.15 It is widely acknowledged that the country is in the midst of a housing crisis, with a pressing need for additional housing to meet the needs of households and to improve the accessibility of the market.
- 4.16 In South Oxfordshire, the housing market is particularly inaccessible, even by comparison with neighbouring LPAs in which housing is unaffordable to a significant proportion of households. This is indicative of a particular need for additional housing within this LPA in the context of a national housing crisis.

5. THE OVERALL NEED FOR HOUSING (THE 5YLS)

- 5.1 As set out above, there is a particular disparity between the need for and supply of housing in South Oxfordshire, such that housing is now unaffordable to a significant proportion of the population.
- 5.2 A further indication of the need for housing in an LPA is the ability of a Council to demonstrate a 5YLS and the extent of any surplus or shortfall¹⁵. I therefore consider the 5YLS position of South Oxfordshire below.

The starting point

- 5.3 In the Housing Land Supply Statement for South Oxfordshire, June 2021 (HLSS) (CD2.5), the Council identify a **5.33 year land supply** (y/s) based on the five year requirement for 5,727 homes and a deliverable supply of **6,101 homes**.
- 5.4 This position has been considered in a number of appeal decisions which are briefly summarised below:
- i. Land at Lady Grove, Didcot (CD7.3) – in which the Inspector found that numerous sites which the Council include in the deliverable supply were not deliverable or less deliverable than suggested by the Council, such that the Inspector concluded that the Council was able to demonstrate roughly a **4.8y/s**.
 - ii. Parkside, Henley-on-Thames (CD7.4) and Mulberry House, Peppard Hill, Henley-on-Thames (CD7.5) – in which the Inspectors noted that the Council had not provided any further substantive evidence to justify a conclusion other than that above, and therefore agreed that there was less than a 5YLS.
- 5.5 Similarly, the Little Sparrows, Sonning Common Inspector found the deliverable supply identified by the Council over the preceding period to be over-inflated¹⁶.

¹⁵ As set out in paragraph 51 of the Court of Appeal Judgment of *Hallam Land Management Ltd vs Secretary of State for Communities and Local Government et al [2017] EWHC 2865 (Admin)* (CD7.25).

¹⁶ See paragraph 25 of the Little Sparrows, Sonning Common appeal decision (CD7.2) in which the Inspector found that there was a 4.21y/s rather than the 5.08y/s identified by the Council.

- 5.6 The starting point for this appeal is therefore that the most recent appeal decision has identified a roughly 4.8yls. This position may however have moved on as progress either has or has not been made towards the delivery of sites. I therefore review the deliverable supply based on the evidence that is currently available in Appendix 1.
- 5.7 This assessment demonstrates that on the basis of either party's position on the deliverable supply, there is a substantial shortfall in the availability of housing to meet housing needs (rather than the housing requirement) in the next five years, with **a shortfall of either 905 or 2,336 homes (with a 3.33 or 4.35yls)**. Notwithstanding that this is not the appropriate measure to determine whether or not paragraph 11d is engaged, this is the appropriate measure to determine whether there is a need for additional housing and clearly demonstrates such a need. This will inevitably be material to the weight afforded to the benefits of increasing the supply of housing as would arise from the appeal proposals.
- 5.8 Furthermore, in accordance with the findings of the Lady Grove appeal decision, the assessment in Appendix 1 demonstrates that the Council is unable to demonstrate a 5YLS even against the constrained housing requirement of the SOLP. This not only engages the tilted balance of paragraph 11d of the NPPF, it also illustrates that the policies of the SOLP have been ineffective in maintaining a sufficient supply against a housing requirement which in itself does not meet housing needs in the early part of the plan period.
- 5.9 Indeed, based on a review of the deliverability of sites, taking account of the limited progress which has been made towards the delivery of numerous sites, it is now apparent that there is a significant shortfall of **1,057 homes (a 4.08yls)** even against the constrained housing requirement. The extent of this shortfall is likely be material to the weight afforded to the policies of the Development Plan which have resulted in this shortfall.

Summary

- 5.10 Recent appeal decisions have demonstrated that the Council is unable to demonstrate a 5YLS even against the constrained housing requirement which does not meet housing needs in the short-term. Since these appeal decisions were determined, owing to the lack of the progress on numerous sites, the position is now materially lower.

5.11 The starting point for this appeal, is that if it is concluded that the appeal proposals accord with the Development Plan when read as a whole in accordance with the position of the Council and the Appellant, the appeal should be allowed without delay in accordance with paragraph 11c of the NPPF. Additionally, the 'tilted balance' of paragraph 11d is engaged given the absence of a 5YLS. This is also material to the determination of the appeal under paragraph 11c or 11d of the NPPF insofar as:

- it demonstrates that the policies of the Development Plan have been ineffective in maintaining a sufficient supply to meet the stepped housing requirement of the Development Plan, such that the weight afforded to these policies should be viewed in this context; and
- it demonstrates that there is a substantial need for additional housing to restore a 5YLS against the stepped housing requirement which itself does not meet housing needs in the short-term, such that the weight afforded to the provision of housing should be viewed in this context.

6. THE NEED FOR AFFORDABLE HOUSING

- 6.1 The SHMA identified a need for 386ahpa in South Oxfordshire over the period 2013-31.
- 6.2 In the period 2013-21, a total of 1,889 affordable homes have been delivered or acquired (236ahpa) according to the DLUHC Live Tables, or a total of 2,028 (254ahpa) according to the Annual Monitoring Report of the Council.
- 6.3 From this, it can be calculated that there is a backlog of either 1,060 or 1,199 affordable homes and this has been generally increasing. The calculations are set out in Table 6.1 below.

Table 6.1 – affordable housing need compared with delivery

	Need	Additions according to DLUHC	Cumulative surplus/ shortfall	Additions according to SODC	Cumulative surplus/ shortfall
2013/14	386	204	-182	187	-199
2014/15	386	167	-401	114	-471
2015/16	386	151	-636	180	-677
2016/17	386	196	-826	172	-891
2017/18	386	179	-1,033	259	-1,018
2018/19	386	319	-1,100	382	-1,022
2019/20	386	463	-1,023	517	-891
2020/21	386	210	-1,199	217	-1,060
Total	3,088	1,889	-1,199	2,028	-1,060

- 6.4 In the absence of sufficient provision to address pre-existing and forecast newly arising affordable housing need, it would be expected that there would remain a pressing need for affordable housing within South Oxfordshire. This is indeed the case, as demonstrated by the fact that there are currently 2,779 households registered in need of affordable housing in South Oxfordshire^{17,18}. Indeed, in paragraph 6.22 of the committee report, the Council recognise the “urgent” need for affordable housing in South Oxfordshire.
- 6.5 In order to address this urgent need for affordable housing, Policy H9 of the SOLP requires the delivery of 40% affordable housing on developments within use classes C2 or C3 that deliver more than 10 homes. This is secured by the appeal proposals.

¹⁷ According to the DLUHC Live Tables.

¹⁸ Recognising that not every household in need of affordable housing may be on the register, but equally a proportion of those on the register may not be in affordable housing need.

Summary

- 6.6 There has been a substantial under-delivery of affordable housing in South Oxfordshire over the plan period to date such that there is now an urgent need for affordable housing, which will be material to the weight afforded to the provision of affordable housing as part of the appeal proposals.

7. THE NEED FOR OLDER PERSONS ACCOMMODATION

The agreed position

- 7.1 The committee report for the appeal proposals, recognised that there was a need for older persons accommodation such as that proposed and that Chinnor provides an appropriate location for addressing this need stating:

“Having regard to an identified need for the type of development proposed, Chinnor has good access to services and facilities and the site is located in a more sustainable location. This is especially the case when considered in the wider context of the district – Chinnor retains a range of village shops, services and amenities...”

- 7.2 This need for older persons accommodation in South Oxfordshire has been established in numerous studies including that considered in support of the appeal decision at Sonning Common, and that prepared in support of the current planning application (CD4.9).
- 7.3 Given the acknowledged need for older persons accommodation, including retirement living or sheltered housing as proposed, the proposed development accords with Policies H1, H13 and CH H5 and the principle of the proposed development at the appeal site complies with the Development Plan.
- 7.4 Whilst this position is agreed and undisputed, in order to assist the Inspector, I present an up-to-date assessment of the need for older persons accommodation within this section.

National guidance

- 7.5 The PPG (63-001) is explicit that there is a “critical” need to provide housing for older people owing to the ageing of the population and the need to provide the older population with a better choice of accommodation to suit their needs.
- 7.6 The starting point is therefore that there is a critical need for such housing nationally. However, the extent of this may vary from area to area.

The ageing population and their needs

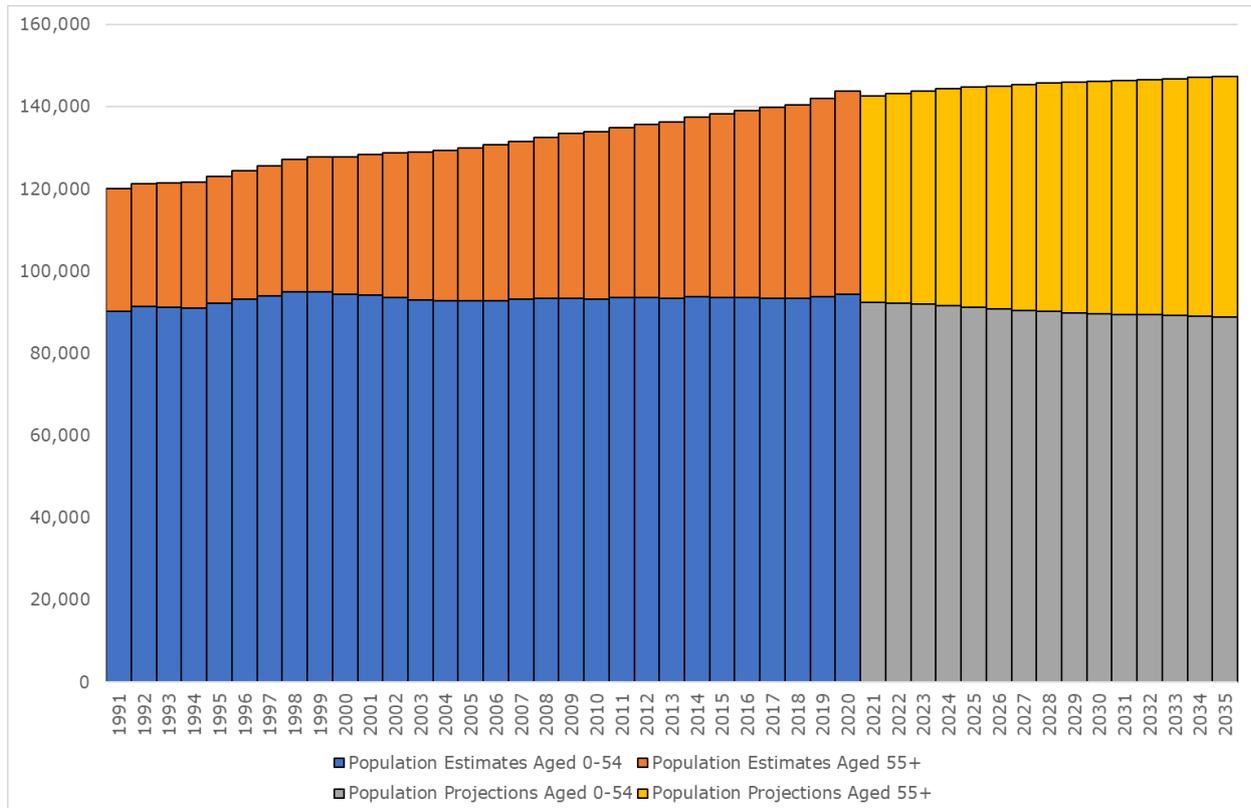
- 7.7 In 1991, 24.7% of the population of South Oxfordshire were aged 55 or over. This has increased year on year, such that by 2020, 34.4% of the population were in

this bracket. This represents an increase of 19.7% with an additional 19,791 people aged 55 or over¹⁹.

- 7.8 By way of comparison, across England the number of people aged 55 or over increased from 25.9% to 30.8% (an increase of 4.9%); and across the South East the number of people in this bracket rose from 26.2% to 32.3% (an increase of 6.1%).
- 7.9 It is therefore apparent that South Oxfordshire not only has a greater proportion of people aged 55 or over than experienced across the nation or region, but also that this has arisen as a result of a significantly greater increase in this population.
- 7.10 The latest sub-national population projections of the ONS indicate that this significant increase in the local population aged 55 and over will continue into the future, such that by 2035 it is projected that 39.7% of the population of South Oxfordshire will fall into this bracket (an increase of 5.3% from the current position). These projections suggest that the population of South Oxfordshire will increase by 5,453 over the period 2020-35, including an increase of 9,359 people aged 55 or over, or in other words, more than the entirety of the population growth will be arise in the older age groups.
- 7.11 By comparison, 34.5% of the population of England (an increase of 3.7%) and 36.8% of the population of the South East (an increase of 4.5%) will be aged 55 or over by 2035.
- 7.12 The increase in the older population that has arisen and which is projected to continue into the future is presented in Figure 7.1 below.

¹⁹ All of these figures are taken from the ONS Mid Year Population Estimates (MYE) unless otherwise stated.

Figure 7.1 – proportion of the population aged 55 and over in South Oxfordshire



7.13 At a more local level, 35.7% of the residents of Chinnor Ward are aged 55 or over, or 36.5% in the wards of Chinnor and Aston Rowant combined. This compares to the 34.4% across South Oxfordshire identified above, and so it is apparent that locally there is an even greater proportion of older people than across South Oxfordshire which itself has a significantly greater proportion of older people than across the region or nation.

7.14 With a greater and increasing proportion of the population falling into this age group, the need for housing to meet the needs of this population will be even more critical than it is at a national scale. This is recognised in paragraphs 4.7 and 4.17 of the CRNP which state:

“In this context many residents who moved to the village in the 1970s to 1990s are now both older and in need of smaller or more specialist housing.”

“Demographic changes indicate that there is an increasing need for housing provision for the elderly in Chinnor. Between 2001 and 2011 the number of residents in Chinnor aged 65 and over doubled. Whilst

many residents are content to continue into retirement in their current homes, others seek alternative housing in the Village with needs falling into three general categories:

- Homes for those who wish to downsize and for surviving partners. The stock of smaller houses has been reduced as many have been extended. There is a need for two-bedroom, high specification dwellings, mainly single storey and with modest gardens.
- Sheltered or managed housing for those capable of independent living with limited support. In Chinnor this housing is available both as social housing through SOHA (Leverkus House, St Andrew's Road / Elm Road) or managed open market housing (Hill Farm Court) but is oversubscribed.
- Care home provision for those no longer capable of independent living. Chinnor does have a care home (Hempton Fields).” (emphasis added)

7.15 The Projecting Older People Population Information System (POPPI) provides projections of the number of older people with particular needs and is commonly used to establish the need (or otherwise) for accommodation suitable for older persons. This suggests that in South Oxfordshire the number of people aged 65 or over²⁰:

- living alone in South Oxfordshire will increase from 9,923 in 2020 to 13,118 by 2035, an increase of 3,195 or 32%;
- who need help with at least one domestic task will increase from 8,870 in 2020 to 11,982 by 2035, an increase of 3,112 or 35%;
- who need help with at least one self-care activity will increase from 8,774 in 2020 to 11,800 by 2035, an increase of 3,026 or 34%;
- with a limiting long-term illness whose activities are limited a little will increase from 7,075 in 2020 to 9,350 by 2035, an increase of 2,276 or 32%;
- with depression will increase from 2,618 in 2020 to 3,391 by 2035, an increase of 2,276 or 32%;
- with severe depression will increase from 830 in 2020 to 1,119 by 2035, an increase of 289 or 35%;

²⁰ POPPI only provides information for those aged 65 or over.

- with dementia will increase from 2,248 in 2020 to 3,272 by 2035, an increase of 1,024 or 46%;
- with cardiovascular disease will increase from 9,727 in 2020 to 12,757 by 2035, an increase of 3,030 or 31%;
- with bronchitis/emphysema will increase from 512 in 2020 to 663 by 2035, an increase of 151 or 29%;
- predicted to have a fall will increase from 8,187 in 2020 to 11,050 by 2035, an increase of 2,863 or 35%;
- predicted to be admitted to hospital as a result of a fall will increase from 1,007 in 2020 to 1,449 by 2035, an increase of 442 or 44%;
- with a moderate or severe visual impairment will increase from 2,717 in 2020 to 3,646 by 2035, an increase of 929 or 34%;
- with some hearing loss will increase from 18,873 in 2020 to 25,199 by 2035, an increase of 6,326 or 34%;
- unable to manage at least one mobility activity on their own will increase from 5,702 in 2020 to 8,019 by 2035, an increase of 2,317 or 41%;
- with diabetes will increase from 3,780 in 2020 to 4,863 by 2035, an increase of 1,083 or 29%.

7.16 It is therefore clear that as a result of the ageing of the population in South Oxfordshire, a far greater proportion of the population will not experience as good a quality of life as would otherwise be the case. As a result, it would be expected that there will be far greater demands on health and social care services.

The need for specialist housing for older people

7.17 The SHMA identified a need for between 65 and 105 specialist homes for older people per annum (excluding care homes) over the period 2011-31. Over the period 2011-21, this would equate to a need for between 650 and 1,050 such homes.

7.18 Of the existing supply of 1,952 homes for older people (excluding care homes) in South Oxfordshire identified by the Elderly Accommodation Counsel (EAC), only 351 opened in the period 2011-21.

7.19 Therefore, over the plan period to date, there is a **backlog of between 299 and 699 specialist homes for older people** (excluding care homes) compared to the needs identified in the SHMA of 2014.

7.20 More recently, in support of the planning application an Assessment of Demand for Retirement Housing in Chinnor (CD4.9) was prepared in March 2021 by Three Dragons. This adopted a number of methodologies for estimating the need for specialist housing and concluded that across South Oxfordshire:

- Based on the Retirement Housing Group (RHG) Model there was a **net shortfall of 488** age exclusive and sheltered homes for sale currently and **no need for rental age exclusive and sheltered homes**²¹; and
- Based on Three Dragons application of the Contact Consulting Model there was a **net shortfall of 771** sheltered and age exclusive homes for sale or shared ownership currently, and **no need for rental homes**.

7.21 And within Chinnor wards:

- Based on the Retirement Housing Group (RHG) Model there was a **net shortfall of 52** age exclusive and sheltered homes for sale currently and **no need for rental age exclusive and sheltered homes**²²; and
- Based on Three Dragons application of the Contact Consulting Model there was a **net shortfall of 66** sheltered and age exclusive homes for sale or shared ownership currently, and **no need for rental homes**.

²¹ Given that Table 3.1 identifies a need for 2,153 specialist homes of which 1,723 are needed for sale, leaving a need for 430 specialist homes for rent (of which only some will be for age exclusive or sheltered homes). As set out in Table 3.3, there were 752 age exclusive and sheltered homes for rent, leaving a net over-supply of rental specialist accommodation for older people.

²² Given that Table 3.5 identifies a need for 119 specialist homes of which 107 are needed for sale, leaving a need for 12 specialist homes for rent (of which only some will be for age exclusive or sheltered homes). As set out in Table 3.6, there were 19 age exclusive and sheltered homes for rent, leaving a net over-supply of rental specialist accommodation for older people.

7.22 The Council accept within the committee report that there is a need for retirement housing and that is supported by the evidence provided by Three Dragons. I have nevertheless sought to update and assess the need for specialist accommodation for older people to identify not only the current need but also the future need for such accommodation in South Oxfordshire.

My assessment of the need for older persons accommodation in South Oxfordshire

7.23 There are a number of methodologies for estimating the need for older persons housing. The SHOP@ tool is referred to in the PPG (63-004) but as recognised in the Little Sparrows, Sonning Common appeal decision (CD7.2) this:

“...only provides a figure based on existing prevalence and then seeks to project that forward with a proportion increase based on the increase in the 75+ age group in the District. This is not a measure of need.” (emphasis added)

7.24 There are a number of different models for estimating the need for older persons accommodation. It should be acknowledged that this is not an exact science and as such it is appropriate to consider a number of such methodologies as Three Dragons have done. The two considered by Three Dragons comprise:

- The RHG Model which is referred to in footnote 29 of Housing in Later Life (CD2.6) and which has been used to establish the need for such accommodation in the London Plan which was found sound and adopted. The RHG Model firstly establishes the number of older households that would seek sheltered or extra care housing based on a standardised assumption that 17.5% of those aged 75 or over and 2.5% of those aged 65-74 would do so. It then assumes that older households that currently own their home would seek accommodation for sale (including intermediate) and those in rental accommodation will seek rental accommodation based on local rates.
- The Contact Consulting Model is set out as an example in Figure 6 of Housing in Later Life (CD2.6) and was supported in the Sonning Common appeal decision. This sets standardised national prevalence rates for the type and tenure of older persons accommodation.

7.25 However, the use of national prevalence rates as set out in the Contact Consulting Model assume that the need for different tenures (i.e. for sale as

compared to for rent) is consistent in every LPA, when this is clearly not the case. In some LPAs more people will live in rental accommodation and will therefore be more likely to need rental older persons accommodation and in others the opposite will be true. Three Dragons therefore adjust the prevalence rates to reflect the variance in the tenure mix in different LPAs to address this issue within the Contact Consulting Model. This responds to the issue identified in the SHMA and the ECHS, namely that there are far more specialist homes for older people in rental accommodation than there are older households in rental accommodation (which will be reflected in the prevalence rates of the Contact Consulting Model).

7.26 I have updated the calculations of Three Dragons to reflect the current supply of specialist accommodation identified by EAC using the latest ONS/DLUHC projections rather than the 2014 based projections used by Three Dragons.

7.27 On the basis of these methodologies, my calculations of the need for specialist accommodation for older people is calculated in Tables 7.1 and 7.2 below.

Table 7.1 – the need for sheltered homes by tenure in South Oxfordshire using the RHG Model

	2021				2035			
	Aged 65-74	Aged 75-84	Aged 85+	Total	Aged 65-74	Aged 75-84	Aged 85+	Total
No. of households (2018 based subnational household projections)	8,381	7,855	3,138	19,374	9,977	9,463	5,422	24,862
Requiring specialist retirement housing	2.5%	17.5%	17.5%		2.5%	17.5%	17.5%	
RHG model estimate of potential demand	210	1,375	549	2,133	249	1,656	949	2,854
Requiring home ownership (2011 Census)	85%	81%	75%		85%	81%	75%	
RHG model of demand for home ownership	178	1,117	413	1,708	212	1,345	714	2,271
RHG model assessment of those in need of support rather than care and home ownership (all under 75s and 72% of 75+'s)	178	804	298	1,279	212	969	514	1,694
RHG model of demand for rental	32	258	136	426	38	311	235	583
RHG model assessment of those in need of support rather than care and rental (all under 75s and 72% of 75+'s)	32	186	98	315	38	224	169	430

Table 7.2 - the need for sheltered homes by tenure in South Oxfordshire using the Contact Consulting Method

	Prevalence rate per 1,000 aged 75+	Population aged 75+ in 2021	Need in 2021	Population aged 75+ in 2035	Need in 2035
Conventional sheltered housing to rent	37	15,657	579	21,077	780
Leasehold sheltered housing	143	15,657	2,239	21,077	3,014
TOTAL	-	-	2,818	-	3,794

7.28 Depending on which of these methodologies is applied, it is therefore apparent that there is currently a need for:

- 1,279 age exclusive or sheltered homes for sale and 315 for rent according to the RHG Model;
- 2,239 age exclusive or sheltered homes for sale and 579 for rent according to the Contact Consulting Model.

7.29 The next step is to consider the supply of such accommodation to determine the net remaining need (if any) for additional provision.

7.30 The EAC is a charity that offers information and advice about accommodation and care options for older people. To support this service, it undertakes research into all forms of specialist accommodation and associated care and support services nationally. This research includes a database of specialist accommodation for every local authority in the country, broken down into age exclusive, retirement/sheltered, enhanced sheltered and extra care housing and by tenure. The database identifies that in 2021 there **are 1,430 age-exclusive or sheltered homes in South Oxfordshire, of which 730 were available for rent²³ and 700 were available for sale²⁴ or for shared ownership²⁵**. It should be noted that the number of homes available have reduced since the Three Dragons Report was prepared, presumably reflecting a number of closures during the pandemic.

²³ Primarily as affordable and social rental but including some private rental.

²⁴ Either as leasehold or freehold.

²⁵ Which are included as a home available for sale given that they provide the opportunity to invest in the property and to work towards home ownership.

7.31 In addition to the existing supply, other schemes may be planned to come forward to address the existing backlog and to address newly arising need. Sites which have gained planning permissions for such accommodation which had not yet been developed in 2021 have therefore been identified and this provides for a potential additional supply of 16 homes for rent and 52 homes for sale at:

- Castle Gardens, Watlington (41 sheltered homes for sale);
- Oakdale Court and Meridian Court, Wallingford (16 rental sheltered homes);
- 11 St Martins Street, Wallingford (8 retirement homes for sale); and
- 1 Orchard Walk, Watlington (3 retirement homes for sale).

7.32 There is therefore **a potential supply of 746 sheltered homes for rent and 752 for sale.**

7.33 From the preceding analysis, the net need for additional sheltered housing is calculated in Table 7.3 on the basis of both methodologies.

Table 7.3 – net additional need for sheltered housing in South Oxfordshire

	Need in 2021	Supply in 2021	Net Need in 2021	Need in 2035	Potential Supply in 2035	Net Need in 2035
Using the RHG Model						
Age exclusive or sheltered homes for rent	315	730	-415 (0%)	430	787	-316 (0%)
Age exclusive or sheltered homes for sale	1,279	700	579 (100%)	1,694	711	942 (100%)
Using the Contact Consulting Model						
Conventional sheltered housing to rent	579	730	-151 (0%)	780	787	34 (1%)
Leasehold sheltered housing	2,239	700	1,539 (100%)	3,014	711	2,262 (99%)

7.34 The preceding analysis demonstrates that there is a pressing need for additional sheltered homes for sale currently. On the basis of any model there is a need for either 579 or 1,539 additional sheltered homes for sale. It also demonstrates that this need will substantially increase based on the available supply, to leave a need for 942 or 2,262 sheltered homes for sale by 2035.

- 7.35 By contrast, the analysis demonstrates that there currently is a comparative over-provision of sheltered homes for rent on the basis of any model which takes account of the large proportion of older people in home ownership in South Oxfordshire, and that in the future either 0% or 1% of the need for sheltered housing will be as rental accommodation. This would identify a need for either 0 or 0.54 rental sheltered homes as part of a development of up to 54 sheltered homes.
- 7.36 It is generally appreciated that there is no demand for rental market sheltered housing²⁶ and this is supported by the fact that the latest EAC data indicates that all of the rental sheltered housing in South Oxfordshire is provided as affordable rental housing. Therefore, it is reasonable to assume that the need for between 0 and 1 (rounded) rental home will be in the affordable sector.
- 7.37 The fact that there is no or a comparatively limited need for rental properties (including market and affordable), as a result of the comparative over-provision of rental properties in the affordable sector, reflects the imbalance of such accommodation as recognised in the SHMA, the EHCS, the Market Assessment of Housing Options for Older People and as found in the recent appeal decision at Little Sparrows, Sonning Common (CD7.2) which states:

“However, there is a very marked disparity in the availability of specialised housing for older homeowners compared with the supply available to older people in other tenures. The current rate of provision favours those in tenures other than home ownership with nearly four times as many units available to them in sheltered, retirement and extra care housing than are currently available for their peers who are homeowners.”

- 7.38 This finding is also to be expected given that in 2011, 82.1% of households aged 65 and over owned their own house either outright or with a mortgage²⁷ whilst only 46.1% of sheltered housing was available for sale in 2021. There is therefore a large disparity between the number of older households who do own their houses and the supply of sheltered houses for this population available for sale, such that it is entirely unsurprising that the need for such accommodation is almost entirely in this sector.

²⁶ Owing to the fact that older people capable of accessing the market sector tend to have assets that can be used to buy a sheltered home but not a regular income to provide certainty of continued finance to access private rental accommodation.

²⁷ Including 74.2% owning their property outright.

The Council's position

7.39 Shortly before the exchange of evidence, the Council provided an extract of the affordable housing register. The extract identifies 21 households aged 55+ who had registered in need of rental affordable housing (including affordable and social rent) who had identified Chinnor as one of their 3 preferences for housing. Of these:

- All but 9 are already adequately housed (in Band 4) and are therefore not in need of affordable housing.
- Of these, a proportion will be seeking affordable housing in the general housing stock rather than within specialist accommodation. The RHG Model suggests that at most 17.5% of these 9 households will be seeking specialist accommodation, which equates to at most 1.6 households.
- Of these, a proportion will be in need of care and so sheltered housing will not be suitable. The RHG Model suggests that at least 72% of these households will not require care, which equates to 1.1 households.
- Of these, a proportion are likely to also have registered and may prefer intermediate accommodation, such that even on the basis of this evidence, there is once again a need for at most c.1 rental sheltered home in the affordable sector.

7.40 In light of the evidence which is available, including that which arises from the RHG Model and the Contact Consulting Model both of which are recommended in Housing in Later Life, and from an assessment of the evidence provided by the Council, there is a need for at most 1 rental sheltered home in the affordable sector.

The appeal proposals

7.41 The appeal proposals have been designed to respond to the need for specialist accommodation for older people within Chinnor and South Oxfordshire reflecting the local assessment of the need for different tenures. The proposals will provide choice to ensure that a greater proportion of older people are able to access the housing that best reflects their changing needs.

- 7.42 The appeal proposals are agreed to comply with Policy H9 and CH H3 of the Development Plan by providing 40% affordable housing, with a tenure mix that reflects local needs including 1 affordable rental home and 20 shared ownership or discounted market sales homes.
- 7.43 Beechcroft Developments have a pedigree in developing such retirement properties, having done so for almost 40 years. If experience is anything to go by, their previous developments have facilitated social interaction of residents with new communities forming. An Estate Manager will be on hand to oversee and maintain the properties and offer help and advice, and the properties and grounds are fitted with numerous features to assist and eliminate risk for residents including smooth paths, alarms, video entry systems, and ovens at a height to prevent the need for bending down for example.

Summary

- 7.44 There is a demonstrable need for the type of accommodation proposed both now and in the future within Chinnor and across South Oxfordshire. The provision of such accommodation, and the tenure proposed accords with the Development Plan.

8. BENEFITS ARISING FROM THE APPEAL PROPOSALS

8.1 There is an acknowledged and evidenced need for specialist housing for older people in South Oxfordshire.

8.2 There are numerous appraisals of the need to provide a choice of accommodation suitable for older people and this need has been recognised by the Government for many years. These assessments also identify a range of benefits²⁸ that arise from the provision of such housing, which are summarised below.

Independent living

8.3 The PPG (63-001) identifies that the provision of specialist accommodation can help older people to live independently for longer. Similarly, in an evaluation of extra care housing in East Sussex, Weis and Tuck (2013) noted that “the accessible environment, not the care, was a significant factor in enabling independence”²⁹.

8.4 WPI Strategy prepared a paper entitled Healthier and Happier in 2019 (CD2.16). This states that purpose-built homes for older people “mean that everyday essential tasks like getting out of bed, going to the bathroom or getting dressed are safer and more manageable, helping to support their independence”.

Reducing injuries

8.5 A report published in 2017 by the Royal Society for the Prevention of Accidents indicates that the majority of injuries in older people that are treated by A&E are caused by accidents in the home – predominantly falls; and noted that falls in older people can lead to a decline in health from fractures and injuries, to fear of falling resulting in social isolation and activity avoidance³⁰.

8.6 In a study carried out for the Joseph Rowntree Foundation³¹, Croucher reported that “living in a purpose-built, barrier-free environment removes many of the difficulties and dangers of living in inappropriate accommodation, in particular the risk of falls”.

²⁸ Page 7 of Housing in Later Life (CD2.6) provides a comprehensive summary of these benefits.

²⁹ The business case for extra care housing in adult social care: an evaluation of extra care housing in East Sussex (CD2.7).

³⁰ Action to Prevent Falls (CD2.8).

³¹ Making the Case for Retirement Villages (CD2.9).

Health, wellbeing and quality of life

- 8.7 In a study looking at the health gain from retirement housing, the Institute of Public Care (IPC) at Oxford Brookes University concluded that for those people in retirement housing, "...the evidence is that for many people there was a substantial improvement in health, a diminution in the volume of care and support required and a greater sense of security and well-being"³².
- 8.8 Specialist forms of housing can also have a positive impact on health which is highlighted by Ball et al. (2011)³³ who report that the overall balance of residents' perceptions of being able to manage their health was better since their move. This is an important indicator of the potential of specialist housing to reduce demand on formal health and social care services.
- 8.9 Similarly, the Market Assessment of Housing Options for Older People (CD2.2) identifies that "moving to specialist retirement housing can improve quality of life in terms of physical health and social well-being".
- 8.10 A 2018 government report on housing for older people links housing to health and well-being and states that "There is a well-evidenced link between housing and health and wellbeing, and the consequent costs of treatment by the health service. Poor quality, un-adapted, hazardous, poorly heated and insulated accommodation can lead to reduced mobility, depression, chronic and acute illness and falls and social isolation to loneliness and depression"³⁴.
- 8.11 Loneliness is becoming an increasing issue, with Age UK data from 2018 showing there are 1.5 million people living in England who feel lonely, and this figure is expected to rise to 2 million by 2025 if nothing is done to solve it³⁵. On the issue of social isolation, Kneale (2012)³⁶ looks at the relationship between social exclusion and age, with the main causes of this including:
- Age-related characteristics that are more likely to occur in later life, such as disability, low income and widowhood.

³² Identifying the Health Gain from Retirement Housing (CD2.10).

³³ Housing Markets in Old Age (CD2.11).

³⁴ House of Commons Housing, Communities and Local Government Select Committee (2018) Housing for Older People (CD2.12).

³⁵ All the Lonely People: Loneliness in Later Life (CD2.13).

³⁶ Is social exclusion still important for older people? (CD2.14).

- Cumulative disadvantage, where cohorts become more unequal over time due to, for instance, the impact of labour market experiences on pension outcomes.
- Community characteristics, which make older people more vulnerable to changing conditions like population turnover, economic decline and crime, in their local areas.

8.12 One way to tackle loneliness is through social activities which increases the chance to meet new people and form relationships³⁷. Purpose-built accommodation for older people often provides the opportunity for regular social events with other residents improving the health and well-being of older people.

8.13 Research by the Personal Social Services Research Unit (PSSRU)³⁸ in 2011 on the social impacts of specialist housing for the elderly concludes that it helps to reduce social isolation and loneliness, whilst encouraging social activity and participation in an environment where residents feel safe and secure. The study also found that after a year of moving into specialist housing “most residents enjoyed a good social life, valued the social activities and events on offer, and had made new friends.”

8.14 In analysis looking at the fiscal and wellbeing benefits of building more homes for later living, WPI Strategy found that “an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living”³⁹ according to national wellbeing criteria. Wellbeing scores increased by 7% following the move as residents reported feeling more satisfied with life and having lower levels of anxiety.

8.15 The Housing, Communities and Local Government Committee launched an inquiry into the housing offer for older people in February 2017, to consider whether it is sufficiently available and suitable for their needs. Just before the inquiry began, the 2017 General Election was called and the Inquiry was closed. The Inquiry was relaunched in September 2017. The Housing for Older People (Second Report of Session 2017-2019) report (CD2.12) was published in 2018 and it draws several important conclusions, including:

³⁷ All the Lonely People: Loneliness in Later Life (CD2.13).

³⁸ Improving housing with care choices for older people: an evaluation of extra care housing (CD2.15).

³⁹ Healthier and Happier (CD2.16).

- Older people who wish to move should be able to choose from a wide range of housing to accommodate their needs and preferences. However, the evidence heard during the Inquiry suggested there was a shortage of desirable mainstream, accessible and specialist housing and bungalows in both the private and social sectors.
- Accessible and specialist homes are a key to housing an ageing population. Specialist housing, particularly extra care housing, can promote the health and well-being of older people and their carers.

8.16 The right kind of housing can keep older people healthy, support them to live independently and in the longer-term reduce the need for home care or residential care and lead to savings in health and social care budgets.

Cost savings

8.17 Future of an Ageing Population (CD2.17) was prepared on behalf of the Government Office for Science in 2016. This identifies that "Poor housing creates hazards that cost the NHS an estimated £2.5 billion per year (across all ages), comparable with the cost of physical inactivity (£1 billion) and alcohol abuse (£3.2 billion)."

8.18 Healthier and Happier (CD2.16) estimates that each person living in a home for later living saves health and social care services £3,490 per annum and estimates that providing 30,000 retirement houses every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.

Releasing housing for other households

8.19 The Market Assessment of Housing Options for Older People (CD2.2) acknowledges that "Older person households are much more likely to under-occupy than other households. Simultaneously, in the current housing market, many young families are struggling to secure housing that is large enough."

8.20 This is similarly recognised in the White Paper entitled Fixing our Broken Housing Market (CD2.18) in 2017 which recognises that "Helping older people to move at the right time and in the right way could also help their quality of life at the same time as freeing up more homes for other buyers."

The specific benefits arising from the appeal proposals

- 8.21 The committee report recognises that the appeal site provides an appropriate location to address the need for accommodation for the older population, given that the site has good access to public transport and a range of shops and facilities are accessible from the site.
- 8.22 The provision of the proposed retirement housing at the appeal site will not only provide the opportunity for residents to access the shops and facilities to allow them to live independently for longer⁴⁰, it also provides the opportunity to support these shops and facilities to the benefit of the wider settlement.
- 8.23 The appeal proposals provide the much-needed choice to the older population recognised in the PPG, by providing retirement housing of which there is currently a shortfall, a mix of cottages and apartments and a mix of affordable and market accommodation.
- 8.24 The appeal proposals provide the opportunity for 54 households resident in Chinnor to remain in Chinnor and therefore to remain part of the community, maintaining existing social and familial relationships, whilst at the same time releasing 54 homes for occupation by younger households. The appeal proposals therefore provide the opportunity to address the issue expressly raised in paragraph 4.15 of the CRNP.
- 8.25 Older households also tend to under-occupy housing⁴¹. In South Oxfordshire, 88.5% of household residents live in a property which is under-occupied, as compared to 84.4% across the South East and 83.3% across England. A greater proportion of the older population are living in homes which are larger than needed for the household in South Oxfordshire. For some households this may be associated with a feeling of responsibility to maintain a larger property with the anxiety that may cause when things go wrong, and it may be indicative of a larger proportion of households living alone with a greater likelihood of loneliness and the associated health and wellbeing consequences. Therefore, in at least certain situations this may be indicative of an undesirable situation.
- 8.26 Furthermore, this under-occupation provides the opportunity to respond to the housing needs for the younger population. If a proportion of older households

⁴⁰ As set out in the PPG (63-001).

⁴¹ I.e. there have at least one spare bedroom.

take the opportunity to move to bespoke retirement accommodation that suits their particular needs, this will release family sized housing to the benefit of families, which in turn will make better use of the existing dwelling stock.

8.27 The provision of 54 such homes will contribute to the deliverable supply for South Oxfordshire and thereby assist in restoring a 5YLS.

8.28 The provision of such accommodation which has been designed specifically to meet the needs of older residents as addressed in the previous section will provide numerous benefits to residents including offering safe and well-insulated housing for the older population, as well as facilitating a new community with shared interests and experiences.

8.29 Numerous reports set out the health and wellbeing benefits provided by such accommodation and the associated improvements to the quality and length of life of residents with lower demands placed on health and social care and reduced costs. Indeed, using the estimated reduction in costs identified in Happier and Healthier, the provision of 54 retirement homes would save the health and social care sector £250,650 per annum.

Summary

8.30 Not only is there an acknowledged need for the housing proposed as part of the appeal, this housing will give rise to numerous significant social, health, and economic benefits, each of which should be considered in the planning balance.

9. THE WEIGHT TO BE AFFORDED

9.1 I defer to Mr Brockbank to afford weight equitably to all of the benefits and adverse impacts arising from the proposed development, but for context I consider the approach adopted in other appeal decisions.

The approach of the Secretary of State

9.2 The weight afforded to the provision of housing by the Secretary of State⁴² in the context of different housing land supply positions is set out in Table 9.1 below.

Table 9.1 – the weight afforded to the provision of housing by the Secretary of State

Decision	Weight afforded:	In the context of a land supply of:
Land to the West of Burley-in-Wharfedale at Sun Lane and Ilkley Road (ref: 3208020)	Very substantial weight	Less than 2.06 years
160 Stanley Road, Stockport (ref: 3205559)	Very significant weight	2.8 years
Land at and adjacent to Hulton Park, Bolton (ref: 3208426)	Significant weight	3.5 to 3.7 years
Land North of Viaduct, Ledbury (ref: 3244410)	Substantial weight	4.22 years
Land at Fiddington, Tewkesbury (ref: 3210903)	Substantial weight	4.33 years
Land at Mitchelswood Farm, East Sussex (ref: 3119171)	Significant weight	4.5 years
Land at Hawthorns, Farnham (ref: 3211033)	Significant weight	4.5 years
Land at South West Sittingbourne/Wises Lane, Sittingbourne (ref: 3233606)	Significant weight ⁴³	4.6 years
97 Barbrook Lane, Tiptree, Colchester (ref: 3223010)	Significant weight	4.7 years
Land at Sandown Park Racecourse, Esher (ref: 3249790)	Significant weight	Less than five years
Whitehouse Farm, Belper (ref: 3198996)	Significant weight	3.7 to 6.6 years
North London Business Park, London (ref: 3189843)	Significant weight	4.8 to 5.1 years
Oxford Brookes University, Wheatley Campus (ref: 3230827)	Very substantial weight ⁴⁴	In excess of 5 years
Land West of Knights Hill Village (ref: 3237042)	Substantial weight	
Land South of Kingfield Road and East of Westfield Avenue, Woking and another (refs: 3265969/3265974)	Substantial weight	
Land at Love Lane, Woolwich (ref: 3233519)	Substantial weight	

⁴² This includes all five-year land supply decisions in England since the start of 2020 that I have been able to identify which afford a specified weight to the provision of housing.

⁴³ Notwithstanding the absence of a policy-compliant level of affordable housing.

⁴⁴ In light of the affordable housing shortfall in that case.

Decision	Weight afforded:	In the context of a land supply of:
Land at VIP Trading Estate, London (ref: 3233585)	Significant weight	
Land to the East of Newport Road and to the East and West of Cranfield Road, Woburn Sands (ref: 3169314)	Significant weight	
Land at Former Westferry Printworks Site, London (ref: 3225474)	Significant weight	
Wembley Park Station Car Park, Wembley (ref: 3275339)	Significant weight	
Land at Burgess Business Park, London (ref: 3225548)	Moderate weight ⁴⁵	
Land off Station Road, Long Melford (ref: 3214377)	Significant weight	5.67 years
Anglia Square, Norwich (ref: 3225505)	Significant weight	5.89 years
Land off Audlem Road/Broad Lane, Stapeley (ref: 2197532)	Significant weight	5.7 to 6.6 years

9.3 It is therefore apparent that the Secretary of State has consistently found that where an LPA is able to demonstrate less than a 4.5yIs, the provision of housing should be afforded either substantial, very significant or very substantial weight, with a single exception. Even where an LPA has been able to demonstrate the minimum five-year land supply required by national policy, the Secretary of State has still afforded at least significant weight with a single exception. It would be expected that a consistent approach would be adopted for the purposes of this appeal and either substantial, very significant or very substantial weight should be afforded on the basis of my position of a 4.08yIs or significant or substantial or very substantial weight on the basis of the Council's position of a 5.33yIs.

Appeal decisions addressing specialist accommodation for older people

9.4 The weight afforded to the provision of specialist accommodation for older people has also been addressed in numerous appeal decisions in recent years, some of which are considered below.

9.5 In paragraph 82 of the appeal decision at the Homebase Site, Bath (CD7.19) the Inspector afforded **substantial weight** to the provision of specialist extra care accommodation given the contribution this would make to the deliverable supply, the fact that such accommodation allows older people to live independently for

⁴⁵ Owing to the less than exemplary nature of the accommodation proposed.

longer, feel more connected to their communities and help reduce costs to the social care and health systems.

- 9.6 In paragraph 34 of the appeal decision at Chelford House, Harpenden (CD7.20) the Inspector afforded **significant weight** to the provision of specialist care home accommodation given the need for such accommodation and the urgency for meeting this need, and the contribution to the deliverable supply in the context of a 2.4yrs.
- 9.7 In paragraphs 109 and 110 of the appeal decision at Little Sparrows, Sonning Common (CD7.2) the Inspector recognised that there was a lack of choice of specialist accommodation for older people and a critical need for such accommodation in South Oxfordshire. In paragraph 111, the Inspector afforded **significant weight** to the fact that specialist extra care accommodation would free up existing homes for younger families and contribute to the deliverable supply in the context of a 4.21yrs and **significant weight** to the health and wellbeing benefits of such provision in paragraph 112.
- 9.8 In paragraph 89 of the appeal decision at Homebase, Walton-on-Thames (CD7.21) the Inspector afforded **considerable weight** to the provision of specialist care accommodation given the need for such accommodation for older people in the context of a 3.96 year land supply.
- 9.9 In paragraph 42 of the appeal decision at the Site of The Rise and Three Neighbouring Properties, Lymington (CD7.22) the Inspector concluded that the delivery of specialist sheltered housing for older people would weigh **very significantly** recognising that such provision responded to the need identified in the PPG, and that it allows older people to live independently for longer, feel more connected to their communities and help reduce costs to the social and health care systems.
- 9.10 In paragraph 70 of the appeal decision at the Former Fleet Police Station, Fleet (CD7.23) the Inspector concluded that:
- The provision of much need retirement housing for older people should be afforded **significant weight**; and
 - The provision of housing should be afforded **substantial weight**;

- The release of under-occupied existing stock should be afforded **substantial weight**; and
- The social benefits of specialised age friendly housing should be afforded **substantial weight**.

9.11 In paragraph 36 of the appeal decision at Royal Cambridge Home, East Molesey (CD7.24) the Inspector afforded **substantial weight** to the provision of specialist accommodation for older people, comprising extra care and a care home..

9.12 These appeal decisions indicate that Inspectors have again afforded at least significant, if not greater weight to the provision of specialist accommodation for older people that not only meets a specific need and gives rise to the numerous benefits that arise from such provision but also contributes to the deliverable supply.

Summary

9.13 In accordance with the findings of the appeal decisions of which I am aware nationally, it would be expected that the starting point would be that at least significant if not greater weight would be afforded to the provision of housing generally; and significant if not greater weight would be afforded to the various benefits arising from the provision of specialist accommodation to meet an acknowledged need.

10. CONCLUSIONS

10.1 As set out in the committee report, the principle of development of the appeal proposals accords with the Development Plan given the need for the development proposed and its sustainable location in terms of accessibility to public transport, shops and facilities.

10.2 The preceding Proof of Evidence considers the need and benefits arising from the proposed development and identifies that:

- i. housing is far less affordable in South Oxfordshire than it is across the nation, which itself is in the midst of a housing crisis, such that housing is inaccessible to a significant proportion of the population, whose needs can only be responded to by significantly boosting the supply of housing locally;
- ii. the Council is unable to demonstrate a 5YLS against housing needs by a substantial margin⁴⁶, which provides a further indication of the pressing need for housing;
- iii. in accordance with recent appeal decisions, once the supply is assessed in accordance with national policy, the Council is unable to demonstrate a 5YLS against the adopted housing requirement which itself does not meet housing needs in the short-term, such that:
 - the tilted balance of paragraph 11d is engaged;
 - the policies of the Development Plan have been demonstrably ineffective in maintaining the minimum supply required by national policy which may be material to the weight afforded to such policies;
 - there is a need to boost the supply of housing to restore a 5YLS against the housing requirement which may be material to the weight afforded to the supply of housing.
- iv. once the deliverable supply is updated to take account of the lack of progress on numerous sites, there is a substantial shortfall in the 5YLS against the housing requirement;

⁴⁶ Even on the basis of their assessment of the deliverable supply which has been found to be over-inflated in recent appeal decisions.

- v. there is a substantial backlog of affordable housing need which has not been addressed such that there is now an urgent need for affordable housing;
- vi. there is a critical need for specialist housing for older people nationally and an acknowledged and evidenced need for age restricted/sheltered housing in South Oxfordshire;
- vii. the majority of the need for age restricted/sheltered housing in South Oxfordshire is for homes available for sale rather than for rent based on the models recommended in Housing in Later Life;
- viii. the provision of specialist housing for older people such as that proposed gives rise to numerous benefits including:
 - Supporting older people to live independently for longer;
 - Reducing the risk and severity of falls amongst the older population;
 - Supporting the health, wellbeing and quality of life of the older population;
 - Creating communities and thereby reducing the potential for loneliness and depression as well as supporting more active lifestyles amongst the older population;
 - Reducing the health and social care costs; and
 - Making more effective use of the existing dwelling stock by releasing under-occupied housing for use by families.
- ix. these benefits have been considered by numerous Inspectors and many of these have been afforded at least significant weight in isolation.