

**Project name:** Land at Bicester Road, Gosford: 22/00747/OUT  
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**Reference:** P18-2523 TN 001  
**Subject:** Provision of Extra Care Housing

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## Introduction

1. This technical note provides a response on behalf of Barwood Development Securities Limited and the Trustees of the Philip King Homes Trust (the “**Applicants**”) following correspondence from Oxfordshire County Council (“**OCC**”) regarding the provision of extra care housing (“**ECH**”) in relation to the Applicants’ outline planning application with reference 22/00747/OUT (the “**Outline Application**”).
2. The Outline Application seeks permission for the development of up to 370 homes, public open space (including play areas and woodland planting), sports pitches and pavilion, drainage and engineering works, with all matters reserved (appearance, landscaping, layout and scale) except for vehicular and emergency accesses to Bicester Road. The proposed development site is Land at Bicester Road, Gosford (the “**Site**”) and forms 27.75 ha of the 32 ha of land (Land South East of Kidlington) allocated for development under Policy PR7a of the Cherwell Local Plan 2011-2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need (“**LPPR**”).
3. In a response dated 27 April 2022, OCC Interim Assistant Director for Housing Vicki Jessop stated that Policy BSC4 of the Cherwell Local Plan, which requires sites of at least 400 dwellings to provide a minimum of 45 self-contained extra care dwellings, is considered to apply to the Outline Application.
4. Discussions have subsequently been held with Dan Hart (OCC Strategic Commissioning Officer) and Vicki Jessop on 15 June 2022. Cherwell District Council officers have requested that the Applicants provide a formal written response to OCC’s consultation response.
5. This Technical Note sets out the Applicant’s formal response. It concludes that there is not a needs-based requirement for the delivery of ECHs at the Site: based on OCC’s own evidence, Oxford City currently has a slight surplus of extra care units; a single scheme of 44 extra care units would be sufficient to address Oxford City’s projected unmet need to 2026; and only 72 extra care units are required to meet Oxford City’s projected needs to 2031. The Site is not considered to meet the specific locational needs for ECH developments as set out in OCC’s evidence and industry guidance and as stated by retirement scheme providers themselves. Further, in discussion with Vicki Jessop (15 June 2022), it was confirmed that OCC have a preferred site elsewhere, where the ECH provision to meet Oxford City’s projected needs to 2031 is proposed to be met in full.
6. It is considered that the proposed delivery of 50% affordable housing more closely matched to the tenure and mix identified in the LPPR and the Oxfordshire Strategic Housing Market

Assessment is most appropriate at this site, and that the provision of an ECH scheme with at least 60 one- and two-bedroom units and at least 30% of units offered for sale would unbalance the wider scheme with potential viability consequences without addressing Oxford City's stated requirements for affordable housing.

## Relevant Policy

### The Cherwell Local Plan 2011–2031

7. Policy **BSC 3** sets out the Council's approach to the delivery of affordable housing. At sites outside Banbury and Bicester, including Kidlington, all proposed developments that include 11 or more dwellings are expected to provide at least 35% of new housing as affordable homes on site.
8. All qualifying developments are expected to provide 70% of the affordable housing as affordable/social rented dwellings and 30% as other forms of intermediate affordable homes. According to the policy, *"social rented housing will be particularly supported in the form of extra care or other supported housing"*.
9. Policy **BSC 4** sets out the Council's requirements with regard to housing mix, as follows:

*"New residential development will be expected to provide a mix of homes to meet current and expected future requirements in the interests of meeting housing need and creating socially mixed and inclusive communities."*

*"The mix of housing will be negotiated having regard to the Council's most up-to-date evidence on housing need and available evidence from developers on local market conditions."*

*"Housing sites of at least 400 dwellings will be expected to provide a minimum of 45 self-contained extra care dwellings as part of the overall mix. Should it be agreed with the Council that extra care housing would not be desirable in a particular location, an equivalent amount of alternative specialist housing (use class C3) for older people will be required."*

*"Elsewhere, opportunities for the provision of extra care, specialist housing for older and/or disabled people and those with mental health needs and other supported housing for those with specific living needs will be encouraged in suitable locations close to services and facilities. All proposals will be expected to provide affordable housing in accordance with Policy BSC 3: Affordable Housing."*

### The Cherwell Local Plan 2011–2031 (Part 1) Partial Review – Oxford's Unmet Housing Need

10. The land subject to the Outline Application forms part of allocation PR7a in the LPPR.
11. The LPPR sets out the proposed approach to the delivery of strategic developments to help meet Oxford's housing needs. The requirements for these strategic developments differ from the general requirements under BSC 3 and BSC 4 in several important respects.
12. In line with Oxford City's affordable housing policy requirements, there are no specific references to the delivery of ECH within the LPPR and the strategic development sites are expected to provide 50% of self-contained dwellings as affordable housing.
13. Policy **PR2** sets out the housing mix, tenure and size requirements which the strategic developments under Policies PR6 to PR9 will be expected to meet, to help meet Oxford's housing needs. It requires:
  1. *"All housing to be provided as self-contained dwellings (use class C3) only."*

2. *Provision of 80% of the affordable housing (as defined by the NPPF) as affordable rent/social rented dwellings and 20% as other forms of intermediate affordable homes.*
  3. *Delivery of 25 to 30% of the affordable homes as one-bedroomed properties, 30 to 35% as two-bedroomed properties, 30 to 35% as three-bedroomed properties and 5 to 10% as four+ bedroomed properties unless otherwise agreed with Cherwell District Council in consultation with Oxford City Council.*
  4. *Delivery of a mix of sizes of market homes to meet current and future needs and to create socially mixed and inclusive communities. The mix of housing is to be agreed with Cherwell District Council in consultation with Oxford City Council having regard to the most up-to-date evidence on Oxford's housing need and available evidence on local market conditions.*
  5. *Provision for key workers as part of both the affordable and market housing mix. The provision shall be made in accordance with Oxford City Council's definition of key workers unless otherwise agreed with Cherwell District Council in consultation with Oxford City Council.*
  6. *Provision of an opportunity for community self-build or self-finish housing to be agreed with Cherwell District in consultation with Oxford City Council."*
14. Policy **PR7a** sets out the specific requirements for the development of an extension to Kidlington on 32 hectares of land east of Bicester Road, which includes the 27.75 ha of land subject to the Outline Application.
  15. The key delivery requirements include the provision of 50% of the homes at the allocation as affordable housing as defined by the National Planning Policy Framework ("**NPPF**"), in line with Oxford City's affordable housing policies, and therefore exceeding the general requirement in Cherwell District of at least 35% affordable housing under Policy BSC 3.
  16. Policy PR7a also requires the preparation of a Development Brief for the allocation and sets out the information that should be included within the Development Brief. The Development Brief is required to include a comprehensive scheme and outline layout for delivery of "*the residential development, formal sports provision and associated infrastructure*". There is no reference to any requirement for the delivery of ECH.

#### **PR7a Land South East of Kidlington Development Brief**

17. At a meeting on 16 June 2022, the Council's Planning Committee approved the June 2022 version of the PR7a South East of Kidlington Development Brief and authorised the Assistant Director – Planning and Development to publish the Development Brief.
18. The approved Development Brief is a material consideration in the determination of any planning applications for the site.
19. With regard to affordable housing, the Development Brief states (on p.29) that "*the affordable housing tender mix is to be agreed with Cherwell District Council. There is a preference for social rent tenure in line with Oxford City Council policy.*"
20. There is no reference within the Development Brief to the provision of ECH at the allocation, albeit there is a cross-reference only to Policy BSC4 within Appendix A of the Brief.

## Local Needs

### Affordable Housing Needs

21. The consultation response received on 25 April 2022 from Cherwell District Council's Strategic Housing Officer confirms that LPPR policies PR7a (Land South East of Kidlington) and PR2 (Housing Mix, Tenure and Size) apply to the Outline Application.
22. In line with LPPR Policy PR2 and the 2014 Oxfordshire Strategic Housing Market Assessment, the Strategic Housing response sets out the following expected mix for affordable housing delivery, unless otherwise agreed with Cherwell District Council in consultation with Oxford City Council:
  - 25%-30% one-bedroom dwellings;
  - 30%-35% two-bedroom dwellings;
  - 30%-35% three-bedroom dwellings;
  - 5%-10% four+ bedroom dwellings.
23. The Strategic Housing response makes no reference to the delivery of ECH at allocation PR7a. It confirms that the expected tenure split (again in line with LPPR Policy PR2) is 80% social rent and 20% intermediate housing.
24. OCC published a Market Position Statement 2019-2022 ("**MPS**") for care services in Oxfordshire in December 2022. OCC subsequently also published a more detailed Oxfordshire Market Position Statement Extra Care Housing Supplement 2019-2022 (the "**ECH Supplement**").
25. The MPS and the ECH Supplement confirm that ECH equates to a Use-Class C3 dwelling house, rather than a C2 use and that ECH is included in the requirement for affordable housing in new developments. The specific characteristics and requirements of ECH set out in the MPS and the ECH Supplement mean, however, that an ECH scheme would not deliver homes that meet all of the affordable housing tenure and mix requirements that must be addressed to meet Oxford City's needs.
26. According to the ECH Supplement:
  - ECH comprises self-contained one- or two-bedroom flats available to rent, buy or part buy-part rent.
  - 40 or more flats are contained in one building with a communal entrance and reception facility. Most schemes are between 50-80 flats. The OCC Specialist Housing consultation response dated 28 April 2022 adds that "*OCC considers 60 units provides the minimum for a viable scheme*".
  - The current balance is approximately 70% rental and 30% shared or outright ownership, but OCC expects schemes will increasingly have a higher percentage of sales.
  - Earlier schemes offered an equal number of one-bedroom and two-bedroom flats but OCC now seek a higher proportion of one-bedroom flats for affordable rent.
27. If the delivery of an ECH scheme of 60 or more one- and two-bedroom flats were to be required under the Outline Application, this would account for a proportion of the Policy PR7a

requirement for 50% of the up to 370 homes to be affordable homes towards Oxford City's needs. This would have a significant impact on the remainder of the affordable homes to be delivered under the Outline Application, which would need to be skewed towards three-bedroom and four+-bedroom homes and more than 80% would be required as social-rented homes given the higher percentage of sales expected by OCC for ECH schemes.

### **Extra Care Housing Needs**

28. When the delivery of expected schemes is taken into account, OCC's evidence in the MPS and the ECH Supplement projects a requirement for only an additional 44 ECHs by 2026 and (with less certainty) an additional 72 units by 2031 to meet Oxford City's needs. OCC has indicated that schemes of below 60 units are not considered viable and that the delivery of a ECH scheme of at least 60 units will be sought on one of the PR6-PR9 strategic sites, representing at least 83% of the Oxford's total projected unmet need to 2031. An oversupply of approximately 172 ECHs more than the projected requirement to meet Cherwell District's needs by 2031 is predicted, based on schemes already expected to be delivered.
29. The MPS and the ECH Supplement confirm that, as at 2019, 17 schemes with a combined 932 extra care units were open and advertised in Oxfordshire, including 54 units at Moorside Place in Kidlington, a combined 231 units across three Oxford extra care facilities and 50 units at Erdington House in Yarnton.
30. The OCC documents estimate that 25 ECHs are required for every 1,000 people aged 75 and over. Based on projections of the approximate population of people aged 75 and over, and current and expected numbers of ECHs in Oxfordshire, OCC identifies a current gap in supply of 586 ECHs (99% of which represents needs in South and West Oxfordshire and the Vale of the White Horse) and projected supply gaps of 605 ECHs by 2026 and 66 ECHs by 2031.
31. The ECH Supplement breaks down the supply gap projections by district. With regard to Cherwell, a current (2019) supply gap of just 5 units is identified (with 312 existing units and a requirement for 317 units). The proposed Kingsmere (60 units) and Graven Hill (55 units) schemes are expected to result in a surplus of 17 homes against a projected need for 410 units by 2026. By 2031, the addition of units at Bankside Phase 2 (73 units), Wretchwick Green (70 units) and Heyford Park (60 units) is predicted to result in an over-delivery of 172 extra care units against a projected cumulative need for 458 units in Cherwell.
32. According to the ECH Supplement, Oxford City currently has a surplus of 2 extra care units, with a combined 231 units at Isis Court, Greater Leys and Shotover View and a requirement for 229 units. No additional extra care schemes are identified in Oxford City by 2026 or 2031. Anticipated rising demand is therefore expected to result in a shortfall of 44 units against a projected need for 275 units by 2026 and a shortfall of 72 units against a projected need for 303 units by 2031.
33. If Policy BSC4 were applied to each of the qualifying PR sites (PR6a, PR6b, PR7a, PR8 and PR9), this would lead to massive overprovision of ECH units. The overall provision across the five qualifying PR sites would be in the order of some 225 units against a requirement for 72 units if the policy minimum 45-unit scheme were provided. Given the latest comments from OCC suggesting that schemes need to be in excess of 60 units to be viable, then this would suggest provision of 300 units across the five PR sites against a requirement for just 72 units. This would be at the expense of meeting the broader range of affordable housing needs in accordance with the required policy mix.

## Site Suitability

34. The ECH Supplement confirms that site locations for ECH *"have to meet the needs of older and disabled people and ideally should be flat, close to public transport and other local amenities"*.
35. The MPS states that:
- "ECH needs to be integrated with local communities and well-connected to transport and other infrastructure. For this reason most schemes are located in urban areas or market towns. However, smaller schemes (minimum of 40 units) are being developed in larger villages. Site locations have to meet the needs of older and disabled people and ideally should be flat, close to public transport and other local amenities."*
36. These factors are consistent with more detailed requirements set out in guidance including The Housing LIN's *Factsheet No. 6: Design Principles for Extra Care Housing* (2020, the **"Housing LIN Factsheet"**) and *Retirement Living Explained – a Guide for Planning and Design Professionals* (2017, the **"Housing LIN Guide"**).
37. According to the Housing LIN Factsheet, ideally ECH sites should be:
- Well-served by public transport – bus stops, train stations, etc.
  - Easily accessible – Preferably a relatively flat neighbouring topography with dropped kerbs and pedestrian road crossings to promote access by ambulant older people, wheelchair users and mobility scooters.
  - Close to local facilities – library, health facilities, post office, leisure and amenity.
  - Close to facilities and shops – for example, at the heart of new or existing residential community.
38. The importance of attractive, sustainable sites is expanded on in the Housing LIN Guide, which identifies that leading retirement living developers *"often consider up to 100 locations before settling on one that works"*. Using Churchill Retirement Living as a case study, the Housing LIN Guide finds that a typical site is: *"a high profile location, on active roads with good transport links; on brownfield land, including former industrial or commercial uses; 0.4 to 1.5 acres (on average supporting 40 units per development, ranging from 25 to 75)"*.
39. With regard to the accessibility of local facilities and shops, the LIN Guide adds:
- "Ideally retirement schemes should be within easy walking distance of the town centre or nearest high street. At Churchill Retirement Living there is much consideration given to the 'quality of the walk', with staff needing to be 'convinced' of its character, gradient and safety (appropriate street lighting, road crossings, and so on). Sites that are more than half a mile from local facilities are not considered."*
40. Planning Issues Ltd, the planning division of Churchill Retirement Living, has separately confirmed to the Applicants that retirement/sheltered housing developments should be located within 0.5 miles and easy walking distance of the nearest town centre, with an acceptable gradient along the route, and that sites further away from town centres do not assist in encouraging occupiers to give up their cars when moving into the developments.



41. Similarly, McCarthy and Stone confirmed that *“our product is built around the principle that our residents will be able to easily walk from one of our developments to access the vast majority of everyday amenities. A key aspect of a suitable retirement site is a central location as we encourage our elderly residents to reduce their reliance on the car.”* McCarthy and Stone added that sites further from town centres have been considered as part of larger housing developments in the past, *“but only when a comprehensive local centre is being provided as part of the overall development.”*
42. Whilst the Site is sustainably located in terms of its walking and cycling distances for the majority of occupants, it is not located in a central location within a settlement and it is not considered to be close enough to a sufficient variety of amenities or a town centre to meet the stricter stated needs of retirement living developers.
43. As set out in the Transport Assessment submitted with the Outline Application, short car journeys of up to 2 km are generally considered replaceable by walking and are considered appropriate for residents accessing education, training or employment. However, with regard to the 0.5-mile maximum walking distance used by residential care home providers when seeking appropriate sites, the Walking Accessibility Isochronal and Amenities Plan in the Transport Assessment (Figure 5.1) demonstrates that Kidlington Town Centre is almost 2 km away, the nearest medical centre is nearly 1 km from the Site and the closest library is approximately 1.5 km walk. These distances are not considered likely to be acceptable to residential care home providers.
44. As noted above, McCarthy and Stone have indicated that large development sites which are not centrally located may be considered where a comprehensive local centre is being provided as part of the overall development. In this regard, it is relevant that the larger proposed developments at land east of Oxford Road (PR6a, 690 dwellings) and land east of the A44 (PR8, 1,950 dwellings), are both required by the LPPR to include a local centre incorporating convenience retail, a café/restaurant and a community building offering opportunities for social/childcare and health provision. Should OCC consider that Oxford City’s projected unmet ECH needs to 2031 must be addressed at one of the Partial Review sites, it is considered that locating ECH near the proposed local centre at either PR6a or PR8 has a better chance of meeting the locational needs of a retirement scheme provider.



## Conclusions

45. The Site does not meet the minimum threshold in BSC 4 of 400 homes, above which at least 45 ECHs are expected to be delivered as part of the overall mix, albeit it is acknowledged that the wider PR7a allocation would just meet the threshold. OCC have identified (in a meeting on 15 June 2022) that a single alternative site to meet the Oxford City ECH requirements has already been identified.
46. There is not a needs-based requirement for the delivery of ECHs at the Site: based on OCC's own evidence Oxford City currently has a slight surplus of extra care units; a single scheme of 44 extra care units would be sufficient to address Oxford City's projected unmet need to 2026; and only 72 extra care units are required to meet Oxford City's overall projected needs to 2031.
47. The Site is not considered to meet the specific locational needs for ECH developments as set out in OCC's evidence and industry guidance and as stated by retirement scheme providers themselves. Whilst the Site is sustainably located for general needs, it is not centrally located within a settlement or within the 0.5-mile distance to the town centre and a full range of facilities and amenities which is used by retirement scheme providers to identify suitable sites.
48. Other, larger allocations (PR6a and PR8) within the LPPR are required by adopted policy to include local centres and may be better placed to successfully meet the locational requirements for ECH through careful design.
49. The proposed delivery of 50% affordable housing more closely matched to the tenure and mix identified in the LPPR and the Oxfordshire Strategic Housing Market Assessment is most appropriate at the Site, and the provision of an ECH scheme with at least 60 one- and two-bedroom units and at least 30% of units offered for sale would unbalance the wider scheme with potential viability consequences without addressing Oxford City's overall stated requirements for affordable housing.