

Response to Inspectors' Request

Joint Local Plan



Introduction

On 22 April 2026, the Inspectors wrote a letter to the Councils ([examination library reference ID16](#)) requesting at paragraph 7 that in advance of MIQs for the next set of hearings in July 2026, the Councils answer the following three questions:

- i. In light of the PPG, a recalculation of the local housing need (LHN) and therefore the housing requirement for the respective Districts.
- ii. The Councils' view on the implications of the revised local housing need/requirement for other relevant parts of the evidence base – including, but not limited to, the Sustainability Appraisal and Habitats Regulations Assessment.
- iii. An updated position relating to any newly arising unmet need from Oxford City and the extent to which this could be accommodated in the Plan.

In this Response Note, the Councils answer these three questions in turn.

In support of these responses, we have provided the following:

- Appendix 1 – Updated standard method calculation

(i) In light of the PPG, a recalculation of the local housing need (LHN) and therefore the housing requirement for the respective Districts

The Inspectors' letter identifies at paragraph 6 that looking ahead to the remaining stages of the examination, it appears unlikely that the Joint Local Plan's adoption will take place within two years of the plan's submission in December 2024, and that this timeframe may have implications for the robustness of the supporting evidence base. In particular, the indication in the Planning Practice Guidance (PPG) that local housing need calculations using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted for examination¹.

We consider that the Planning Practice Guidance does not preclude reliance on a local housing needs assessment merely because a local plan was submitted more than two years previously. The PPG provides guidance but does not attempt to cover every situation that might arise when plan-making. It provides a defined period (two years from submission) when there is no need to consider whether a local housing needs assessment should be updated. The PPG does not say that at the end of that two year period the assessment must be set aside. We note that similar circumstances have arisen recently in other examinations, including the Charnwood Local Plan where the Inspectors were content that the Local Housing Need (LHN), whilst based on the position more than two years ago, did not require updating as the affordability ratios had improved during their examination process². This reflects the commonsense position that the question is one of planning judgment. However, since the calculation methodology is a straightforward one, set by government, and does not require commissioning of an updated study, it is a simple matter to recalculate the local housing need, and we present the results below.

The standard method applicable to the Joint Local Plan, which is being examined under the December 2023 National Planning Policy Framework (examination library reference [LNP01](#)) is the 'old' standard method, rather than the stock-based approach in the 'new' standard method. Our recalculation therefore follows the same methodology as that informing the submitted Plan, updated to reflect the most recent available data.

One of the inputs to the calculation is affordability ratios for each district, which the government aims to publish on an annual basis. Their latest household affordability ratios (March 2026) are for 2025. Full details of how the councils have worked out

¹ Paragraph ID2a-008-20190220 of the PPG

² The Planning Inspectorate, 'Report on the Examination of the Charnwood Local Plan 2021-2037', January 2026, paragraph 98.

our standard method figure, including the methodology and calculation, are provided at Appendix 1.

The recalculation in Table 1 below shows a decrease of 4.7% in the LNH for each council as follows:

Table 1. Submission LHN, Recalculated LHN and Change in annual LHN figure

Local Housing Need			
Council	Submission JLP local housing need (dpa)	Updated recalculated local housing need (dpa)	Change
South Oxfordshire	579	552	-4.7%
Vale of White Horse	633	603	-4.7%

Applying these updated annual LHN figures to the JLP plan period (2021 to 2041), and including the agreed unmet housing need from Oxford, results in the following total housing need for each council (see Table 2). South Oxfordshire's housing need would reduce by 540 homes (-3.3%) and Vale of White Horse's would reduce by 600 (-4.1%) over the plan period.

Table 2. Total housing need at submission, recalculated and % change

Total housing need			
		South Oxfordshire	Vale of White Horse
A	Submission JLP local housing need*	579	633
B	Recalculated local housing need*	552	603
C	Oxford unmet housing need	4,950	1,830
D	Total submission JLP housing need (A+C)	16,530	14,490
E	Total recalculated JLP housing need (B+C)	15,990	13,890
F	Change	-3.3%	-4.1%

* each district's own total housing need per annum, excluding agreed unmet need

The recalculation reduces LHN by less than 5%. We do not consider a change of 5% to LHN to be significant or material, and in the Councils' judgement, this scale of change would not necessitate reducing the housing requirement set out in Policy HOU1 of the Joint Local Plan. The housing requirement (and supply) would continue to meet our own housing needs calculated using the standard method, plus the agreed unmet need from Oxford. We therefore suggest no change is needed to the housing requirement.

(ii) The Councils' view on the implications of the revised local housing need/requirement for other relevant parts of the evidence base – including, but not limited to, the Sustainability Appraisal and Habitats Regulations Assessment

As set out in our response to point (i), the recalculated LHN figures are marginally lower than those informing the submitted JLP. The Councils have therefore considered the implications of this recalculated LHN position for the supporting evidence base. Given both the limited scale and downward direction of the change, the Councils' review has focused on whether the revised figures materially affect the conclusions of the evidence base, rather than re-running underlying assessments. The evidence potentially impacted by a LHN recalculation include:

- Sustainability Appraisal ([examination library reference CDS03](#))
- Habitats Regulations Assessment (HRA) ([examination library reference CSD04](#))
- Joint Housing Needs Assessment (JHNA) ([examination library reference HES15.1](#))
- Infrastructure Delivery Plan (IDP) ([examination library reference CSD05.1](#))
- Viability Report ([examination library reference ITV04](#))

Given that a lower housing need has been recalculated, there are unlikely to be implications on the accompanying evidence base. We explain this for each relevant evidence base document that could be potentially impacted by a LHN change below.

Sustainability Appraisal Implications

The SA ([examination library reference CSD03](#)) tests four housing need options in Section 4.5, including options with housing figures higher than the recalculated LHN for each district. The SA assesses a LHN of 12,100 for SODC (excludes Oxford's unmet need) and 12,560 for Vale (also excluding Oxford's unmet need). The SA assesses a total LHN of 12,100 for SODC (excludes Oxford's unmet need) and 12,560 for Vale (also excluding Oxford's unmet need). The updated LHN calculation is marginally lower than those tested through the SA process. As a result, the Councils consider that the SA methodology remains appropriate and that the conclusions reached are not undermined by the recalculated figures. In particular,

the SA has already tested reasonable alternatives and strategic effects across a range of housing outcomes exceeding the revised need.

Habitats Regulations Assessment (and transport assessment) Implications

The HRA Appropriate Assessment report, December 2024 ([examination library reference CSD04.1](#)) considered a range of impact pathways by which policies in the JLP could give rise to likely significant effects to European designated sites, either alone or in combination with other plans and projects.

An HRA Addendum, August 2025 ([examination library reference LPA43](#)) specifically assessed atmospheric pollution impacts on three designated sites in South and Vale (Cothill Fen, Oxford Meadows and Aston Rowant SSSIs). The methodology for this assessment is set out in the HRA Methodology Paper ([examination library reference LPA20](#)) (a useful summary is provided at paragraph 3.25) and relies on traffic modelling data taken from the JLP's transport assessment to assess the plan's impact on these sites from an air quality perspective. The transport assessment models a 'worst case scenario' in terms of magnitude of impacts by assuming all allocated housing sites (the housing supply) build out before the end of the plan period in 2041, and it also uses a date range from 2019-2041 which includes two years before the start of the JLP. Consequently, any reduction in housing need would not affect whether the HRA identifies significant effects to European sites, since it has already modelled the impact of all site allocations and permissions homes coming forward, which far exceed housing need and requirement anyway.

Similarly, a marginally lower LHN calculation is likely only to reduce recreational and hydrological impacts on designated sites in South and Vale, and because the difference in calculated impacts would be minimal, no changes to the HRA methodology is needed and no update is necessary.

JHNA Implications

The Councils JHNA consultant, ORS, has confirmed that although the JHNA ([examination library reference HES15.1](#)) uses LHN for its assessment of specialist and affordable housing need, the overall slight downward change in LHN, if updated, would not be significant. Therefore, a recalculated LHN would not affect the JHNA conclusions. The housing evidence base continues to support the JLP strategy, whether the LHN figures are adjusted in a minor way or not.

IDP Implications

The IDP ([examination library reference CSD05.1](#)) identifies the infrastructure requirements of the strategic sites in chapter 8 of the JLP. It does not reference or rely on LHN per se, and so is not affected by any change in it. Given that the revised need is lower than that informing the submitted Plan, and materially lower than the level of development assumed in infrastructure planning, the Councils do not consider that any further evidence updates are required.

The Councils are not proposing any changes to the set of allocations, so lowering the housing requirement in HOU1 marginally (to reflect the change in LHN) would simply increase the 'headroom' slightly. Such an approach would not trigger an exercise in removing allocations or adjusting numbers on sites in a way that would require them to deliver less infrastructure.

Viability Report Implications

As there would only be marginal reductions in LHN, this would not worsen viability. As above, the Councils would not be seeking to de-allocate or reduce numbers on sites, the difference would be simply slightly more 'headroom' in the supply. The findings of the Viability Report therefore remain appropriate and applicable to the JLP whether a minor adjustment to LHN is made or not.

Taking the above matters together, the Councils judgement is that the recalculated LHN figures do not materially alter the conclusions of the supporting evidence base. The evidence continues to support the JLP's strategy in a coherent and consistent manner, and the Plan remains robust to the marginal change identified in the recalculated LHN figures. Given that the change is small, the Council proposes no change to the requirement in HOU1, no change to supply or site allocations, and therefore no implications for the evidence base.

iii. An updated position relating to any newly arising unmet need from Oxford City and the extent to which this could be accommodated in the Plan.

The Councils continue to engage proactively and constructively with Oxford City Council and other Oxfordshire authorities on Oxford's unmet housing need. Our examination note of February 2026 sets out how we are making progress and are maintaining effective cooperation ([Examination Library reference LPA42](#)) (see the summary table on page 8 of LPA42). This included news on the Interim Statement of Common Ground we signed in January 2026 with Oxford and all the Oxfordshire district councils, which is reproduced on pages 66 to 72 of LPA42.

Since February, this engagement has been ongoing, and it has been effective.

The statutory Duty to Cooperate was formally revoked on 25 March 2026, and we have continued our engagement on Oxford's unmet need in accordance with national policy on maintaining effective cooperation (NPPF December 2023 paragraphs 24 to 27). Engagement remains focused on maintaining an up-to-date shared understanding of new information on the housing needs and capacity of Oxford, and reaching a resolution about how it is being dealt with across Oxfordshire.

Oxford City Council is progressing its emerging Local Plan 2045. Since February, the Councils formally engaged with Oxford City Council, prior to, during, and following its publication period for the (Regulation 19) Local Plan 2045. Oxford's Regulation 19

consultation launched on 30 January and closed on 13 March 2026. Both South Oxfordshire and Vale of White Horse Councils submitted representations supporting the use of the standard method, and supporting the housing capacity estimate set out in the emerging plan (9,267 homes over the period 2025-2045), stating that we considered that this capacity is evidenced and justified, subject to the review of Oxford's final capacity study. Our representations also confirmed the provision in the JLP for our agreed contribution for Oxford's unmet needs. Our engagement on the emerging Oxford Local Plan 2045 has therefore been effective in supporting Oxford's position on their unmet need.

We held a bilateral officer meeting with Oxford City Council on 9 April 2026 to discuss our Regulation 19 stage representations and the wider implications for unmet need. This discussion reinforced a shared understanding of how the JLP and Oxford's emerging Local Plan align on the delivery of Oxford's unmet housing need. The discussion was constructive and reinforced the positive basis for continued cooperation on how unmet need will be addressed in the two districts.

Alongside this bilateral engagement, we have continued to participate in the regular county-wide meetings through the Duty to Cooperate Forum, which has been renamed the Development Plan Cooperation Forum (DPC) following the formal revocation of the statutory Duty to Cooperate:

- At the March 2026 Forum, all parties considered a first draft early 'skeleton' Memorandum of Understanding (MoU – a working title), focussing on Oxford's unmet housing need, identifying any gaps in the MoU, and discussing how these could be addressed collaboratively. This was an effective meeting for coming to resolutions about the scope and content of the MOU.
- At the next Forum, held on 1 May 2026, there was a helpful and frank discussion, with suggested edits to the MOU content and for making tables more forward-looking. Oxford took away an action to produce and circulate an updated version, so that it can be prepared for sign off.

The new MoU will be a document to accompany Oxford City Council's submission of the Oxford Local Plan 2045, planned for late June 2026 (and also likely to be of relevance for submission to the JLP examination library, if the Inspectors would like this).

At the Forum meetings and through work between the Forums, South Oxfordshire and Vale of White Horse Councils have consistently provided clear and detailed explanations of how we support Oxford in addressing their unmet housing need through the JLP, including the quantum of homes to be delivered, their location, and the relevant delivery timescales.

Unmet need updates

While the MoU is being finalised, the Regulation 19 version of the Oxford Local Plan 2045 provides a working basis for the re-calculation of unmet need from Oxford City

and answering the Inspectors' question on the extent to which this could be accommodated in the JLP.

Oxford City Council explained at the Forum meeting on 1 May 2026 that the Interim SOCG (January 2026, pages 66 to 72 of [examination library reference LPA42](#)) had contained an error where it presented the new standard method housing figures for Oxford. The Interim SOCG contained a figure of 1,082 dwellings per annum, and the Oxford Regulation 19 Local Plan used a marginally higher figure of 1,087 per annum. We calculate that based on the latest published affordability ratios, the number would come down slightly to 1,074 a year. In May 2026 the Government will release the latest live tables on dwelling stock, which could change the need again slightly (we can confirm the figure once published in May). Table 3 shows the minor fluctuations in the emerging Oxford local housing figure over time through the various recent documents and government data releases.

Table 3. Setting out the evolution of the New Standard Method figures for Oxford

Stage/ document	Oxford's New Standard Method housing figure (dwellings per annum)
In the signed Oxfordshire Interim Statement of Common Ground (30 January 2026)	1,082
In Oxford's Regulation 19 Local Plan (30 January 2026)	1,087
Latest SM based on latest affordability ratios (March 2026)	1,074

Using the Oxford Regulation 19 figures (the highest) for the emerging MOU work, **all Oxfordshire authorities agree that there is unmet need total of 12,473 homes in the period 2025-2045.**

This represents a reduction of 1,826 homes (almost 13% less) compared with the previously identified unmet need of 14,300 homes arising from the adopted Oxford Local Plan 2036, which informed the unmet need assumptions for the JLP's Regulation 19 stage.

Provision for unmet need in the JLP from South and Vale

The Councils have been considering this updated position carefully, and note that, when considered in conjunction with the provision made by other Oxfordshire districts in their emerging plans, the JLP already makes provision, in combination with those other plans, well in excess of this revised unmet need figure of 12,473 homes.

In the submission JLP, South Oxfordshire committed to accommodate 4,950 homes for Oxford's unmet need (see paragraph 6.10 of the JLP, and the Oxford numbers incorporated in Policy HOU1). The JLP allocates three sites which are well suited to meet this requirement. These three sites alone have a combined capacity of approximately 5,380 homes, as set out³the Interim Statement of Common Ground², so the JLP provides a contingency of 430 homes against Oxford's unmet needs to be addressed in South Oxfordshire (approximately 9% above the agreed requirement).

In the submission JLP, Vale of White Horse committed to accommodate 1,830 homes for Oxford's unmet need (Policy HOU1). This is less than the previously agreed apportionment for Vale of White Horse because at the time of submission, the only agreed quantum and apportionment of unmet need was for the period 2019 to 2031. Two years of this fell before the start of the JLP plan period, and so Vale of White Horse added the need pro-rata for the period 2021 to 2031. The JLP addresses this through allocations delivering a total capacity in the plan period of around 3,646 homes, as set out in the Interim Statement of Common Ground. This provides a contingency of 1,816 homes against Oxford's unmet needs to be addressed in Vale of White Horse (approximately 99% above the agreed requirement).

Collectively the JLP acknowledges the need to provide for Oxford's unmet need, with this assistance totalling 6,780 homes. The JLP does not ringfence specific sites solely to address this need, and recognises that, in practice, Oxford's unmet need will be partly addressed by new housing across the districts.

Table 4. JLP Provision against Oxford unmet need

	JLP Provision	Homes
A	South Oxfordshire unmet need apportionment	4,950
B	Vale unmet need apportionment	1,830
C	S&V total unmet need to be addressed by the JLP (A + B)	6,780
D	South capacity of site allocations with strong Oxford relationships	5,380
E	Vale capacity of site allocations with strong Oxford relationships	3,646
F	S&V total capacity of JLP site allocations with strong Oxford relationships (D + E)	9,026
G	Surplus provision in plan period (F – C)	2,246

The JLP provides a housing supply of 20,457 homes in South Oxfordshire and 19,599 homes in Vale of White Horse⁴, significantly exceeding each districts' own housing needs, and the apportioned shares of Oxford's unmet needs. In addition, the JLP contains site allocations with strong geographical relationships with Oxford, with

³ [Interim Statement of Common Ground, January 2026](#)

⁴ See proposed modification to Policy HOU2: Sources of Housing Supply (examination library reference CSD01.1)

a total capacity of 9,026 homes on these sites in South and Vale. These sites alone represent a surplus of around 2,246 homes against the agreed apportionment, equating to provision of around 33% above the unmet need previously apportioned to South and Vale.

In light of the updated evidence, the Councils do not consider that any newly arising unmet housing need from Oxford City has emerged that would require further provision through the Joint Local Plan. On the contrary, the updated unmet need figure is lower than previously assumed (12,473 rather than 14,300 that the JLP assumed at submission), and the JLP includes substantial headroom of supply above that revised requirement. The Councils therefore consider that the Plan's approach to addressing Oxford's unmet housing need remains robust, effective and consistent with national policy expectations.

Provision for unmet need in Oxfordshire

Across Oxfordshire, we can provide an updated picture on each district's position based on their last published Local Plan's data. This shows how each district's provision for Oxford's revised unmet housing needs in their respective emerging local plans can contribute to meeting and exceeding the new unmet need figure.

Table 5 overleaf shows clearly that in combination, emerging plans across Oxfordshire, contain more than enough housing to meet Oxford's unmet need.

Table 5. Updated position on Oxford's unmet need

		Contribution for Oxford's unmet need in emerging local plans²
Cherwell		4,400
South Oxfordshire		4,950
Vale of White Horse		1,830
West Oxfordshire		2,750
A	Total contribution for Oxford's unmet need <i>(covering various local plan periods)</i>	13,930
		Oxford Local Plan
B	Oxford's 2036 Local Plan unmet need <i>(covering various Oxfordshire Local Plan periods from 2011 – 2031/2034)</i>	14,300
C	Oxford's Reg 19 standard method-based local housing need (2025-2045)	21,740
D	Oxford's Reg 19 revised identified supply (2025-2045)	9,267
E	Oxford's Reg 19 based revised unmet need (2025-2045)	12,473
	Change from previous unmet need to revised unmet need (B – E)	1,827 fewer
		Summary
Oxford's Reg 19 based revised unmet need (2025-2045) (E)		12,473
Contribution for Oxford's unmet need in emerging local plans (A)		13,930
Oxford's additional unmet need outside of already committed contribution		- 1,457 (a surplus of almost 12%)

Conclusion

This response draws together the Councils' position on the three matters raised by the Inspectors and demonstrates that, taken as a whole, the Joint Local Plan 2041 remains coherent, justified and robust.

First, in response to the request to reconsider the local housing need in light of the Planning Practice Guidance, the Councils have noted that where similar circumstances have arisen recently in other examinations, Inspectors have been content that the Local Housing Need did not require updating, because affordability ratios had improved during the examination process. Nonetheless, the Councils have undertaken a full re-calculation using the standard method applicable to the JLP. This recalculation results in a marginal reduction in local housing need (less than 5% in each district). Given that the scale of change is limited, we consider that it does not materially alter the housing requirement or undermine Policy HOU1, and that an adjustment is not necessary. The Plan continues to meet each district's own housing needs in full, alongside the agreed contribution to Oxford's unmet need. Any downward adjustment would simply mean the supply in the plan provides a marginally higher percentage 'headroom' above the requirement.

Second, the Councils have considered the implications of a recalculated local housing need for the wider evidence base. Given the modest downward change, the review has appropriately focused on whether the revised figures would affect the conclusions of the supporting assessments. There are no material implications for the Sustainability Appraisal, Habitats Regulations Assessment (including its transport and air quality evidence), the Joint Housing Needs Assessment, the Infrastructure Delivery Plan or the Viability Report. In several cases, the evidence has already tested development levels exceeding the revised need, or is based on 'worst-case' assumptions. The Councils are therefore satisfied that the evidence base remains internally consistent, up to date and fit for purpose, and that it continues to support the Plan's strategy.

Third, the Councils have set out the updated and agreed position on Oxford City's unmet housing need, reflecting Oxford's emerging Local Plan 2045 and ongoing effective cooperation across Oxfordshire. Latest joint work shows that the revised unmet need is lower than previously assumed. The Joint Local Plan already provides substantial headroom above the new figures. The Councils' agreed contributions remain fully deliverable and are supported by site allocations that provide appropriate contingency. When considered alongside the committed contributions of other Oxfordshire authorities, the evidence demonstrates that Oxford's updated unmet need can be met in full, with a surplus, without requiring any additional provision through the Joint Local Plan.

Appendix 1: Updated standard method calculation

Note: We have calculated the LHN using the standard method associated with the December 2023 NPPF, which you can access here: <https://webarchive.nationalarchives.gov.uk/ukgwa/20241119230327/https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

	2025 Forecast population ¹	2035 Forecast population ¹	Total population growth between 2025 and 2035	Projected average annual household growth between 2025 and 2035	2025 Affordability ratio ²	Adjustment Factor ³	Standard method figure 2025 ⁴	Submission (Policy HOU1) standard method figure
South Oxfordshire	60,344	64,352	4,008	401	10.04	1.3775	552	579
Vale of White Horse	57,149	61,760	4,611	461	8.91	1.306875	603	633

¹ 2014-based household projections in England, table 406 unitary authorities and districts in England – available here: https://webarchive.nationalarchives.gov.uk/ukgwa/20241102155315mp_/https://www.gov.uk/government/collections/household-projections

² Most recent median workplace-based affordability ratios – currently 2025 – available here: [House price to workplace-based earnings ratio - Office for National Statistics](#)

³ Adjustment factor calculation:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

⁴ Projected average 10-year growth multiplied by the adjustment factor

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