

South Oxfordshire and Vale of White Horse District Councils Local Plan Examination

Note prepared by ORS in response to issues discussed under Matter 3 (the housing requirement)

1. This note has been prepared by Opinion Research Services (ORS) as a follow up to the Matter Statement 3.3, with the original question set out below.

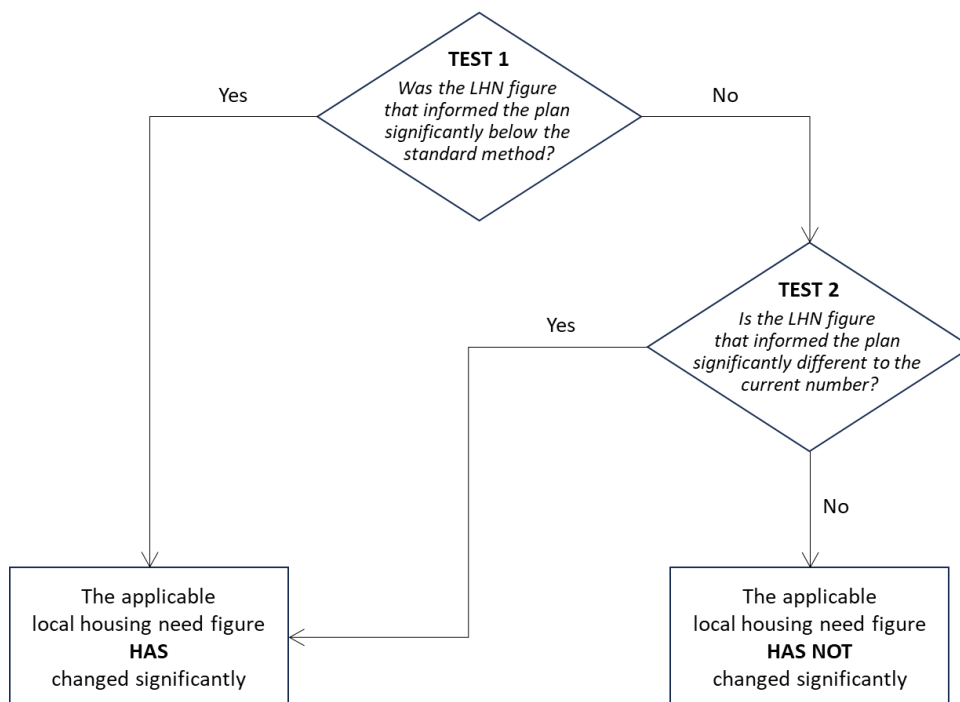
Are there any implications of the recalculated LHN for the Joint Housing Needs Assessment [HES15/1]? In particular, are there any implications for the identification of affordable or specialist housing needs in the districts?

2. Following the discussion in the examination, we consider that the questions can be broken down into three different sections, namely:
 - a) Does a reduction of 4.7% in the annual LHN have a significant impact on the Joint Housing Needs Assessment (HES15/1)?
 - b) Does changing the time period of the plan from 2021-2041 to a new date of 2025-2043 have significant impact on the Joint Housing Needs Assessment? and
 - c) Does the existence of more up to date data necessitate an update to the Joint Housing Needs Assessment?
3. We will consider each of these question in turn.

Does a reduction of 4.7% in the annual LHN have a significant impact on the Joint Housing Needs Assessment (HES15/1)?

4. Our original response in Matter Statement 3.3 focused upon this issue. We confirm that our professional judgement is that a change in the annual LHN of 4.7% per annum does not represent a significant change and therefore it would not have a significant impact upon the findings of the Joint Housing Needs Assessment (HES15/1).
5. To reiterate our key points, Paragraph 33 of the National Planning Policy Framework (December 2023) states that *“Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly”*.
6. Further detail is provided in Planning Practice Guidance [ID 61-062-20190315] which states *“Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method”*.
7. There are therefore two tests that must be considered in order to determine whether or not the applicable housing need figure has changed significantly, as illustrated in Figure 1:

Figure 1: Approach for establishing whether the applicable local housing need figure has changed significantly



8. For South Oxfordshire and Vale of White Horse, Policy Test 1 is not relevant as the plan submitted to examination was based upon the then standard method figures for each council. Therefore, the key question relates to Policy Test 2, and does a 4.7% annual reduction in need represent a significant change?
9. Given the inherent uncertainties in any assessment of local housing need, ORS have concluded in other studies that a change of 5% to be not significant. In our professional judgment, a change of 4.7% in the overall housing need is not significant and will not have a major impact on the calculation of affordable and other specialist housing needs. Whilst our primary reason for this view is that the **scale** of change is modest, it is also worth bearing in mind that the **direction** of change in this case is downwards, that is to say the overall need has reduced and not increased.

Does changing the time period of the plan from 2021-2041 to a new date of 2025-2043 have significant impact on the Joint Housing Needs Assessment?

10. This issue links to the earlier points around the reduction in the annual LHN. The key number which drives much of the analysis in the Joint Housing Needs Assessment (HES15/1) is the annual LHN. The study used the annual LHN figure as the starting point for its analysis.
11. It is relevant to note that the calculation of the annual LHN takes the average annual household growth over a 10-year period as a starting point, and PPG states that this can be used to inform the whole Plan period (Reference ID: 2a-012-2019022). In the same way, it is appropriate to use the average for the LHN to inform the evidence for the whole Plan period. This is irrespective of whether the study date is 2021-2041 or 2025-2043. On this basis the projected annual dwelling growth going forward from 2026 would be exactly the same.
12. For clarity, this does not imply that the annual outputs will be exactly the same. For example the population and household profile in the projection for 2021-2025 (the years no longer covered by

the Plan) will be different than that for 2041-2043 (the additional years that the Plan will be extended to cover) and the LHN for the period 2021—2025 will also be different. However, the impact of any one year's data is averaged over the period of the Local Plan, so any changes in this case would be spread over the 20-year and 18-year plan period and it is again our professional judgment that they would not significantly alter the finding of the Joint Housing Needs Assessment. The existing LHNA has a significant overlap with the current proposed Plan period, and it is entirely appropriate to roll forward the requirement to 2043 on the basis that LHN figure will remain the same.

13. This is similar to the position ORS and the Council adopted in the Middlesbrough Local Plan examination, where the ORS SHMA was written in 2021 and covered the period 2019-2037, while the Local Plan was submitted in 2025 and covers the period 2022-2041. The issue of this mismatch of dates was covered at the hearings in March 2026 and the Council have been allowed to proceed to the next stage of the hearings without an action requiring the SHMA to be updated.

Does the existence of more up to date data necessitate an update to the Joint Housing Needs Assessment?

14. The Joint Housing Needs Assessment uses a wide range of data including;
 - a) The UK Census of Population;
 - b) The current dwelling stock, including the stock of dedicated older person accommodation;
 - c) Population and Household projections;
 - d) Land registry house prices and rental data from the VOA;
 - e) DWP data for the take up of housing benefit, including that link to Universal Credit;
 - f) A range of measures for the current housing need including data linked to the councils' housing register, homelessness, those in temporary accommodation and concealed households.
15. Some of this data such as that from the Census is fixed over time, but other parts of the data used in our analysis are updated monthly, quarterly, annually or in the case of population and household projections the most common update period is biennial.
16. Therefore at any one time during the preparation and examination of a local plan, any Housing Needs Assessment is likely to be using data which has been superseded by a more recent data set. This in turn raises the question as to whether the study has sufficiently aged for the study to no longer be considered valid.
17. We reiterate that Paragraph 33 of the National Planning Policy Framework (December 2023) states that *"Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly"*.
18. Until relatively recent the typical expectation was that a Housing Needs Assessment should be updated every 5 years. More recently, we would not necessarily expect a study to remain robust for 5 years, as the policy agenda has typically moved on every 2-3 years. However, the Joint Housing Needs Assessment was produced in 2023 under the NPPF 2021, where the key sections covering housing need were the same as those in the NPPF 2023. Therefore there was no key policy change

between the production of the study and the publication of the NPPF 2023 under which the South Oxfordshire and Vale of White Horse District Councils Local Plan is being examined.

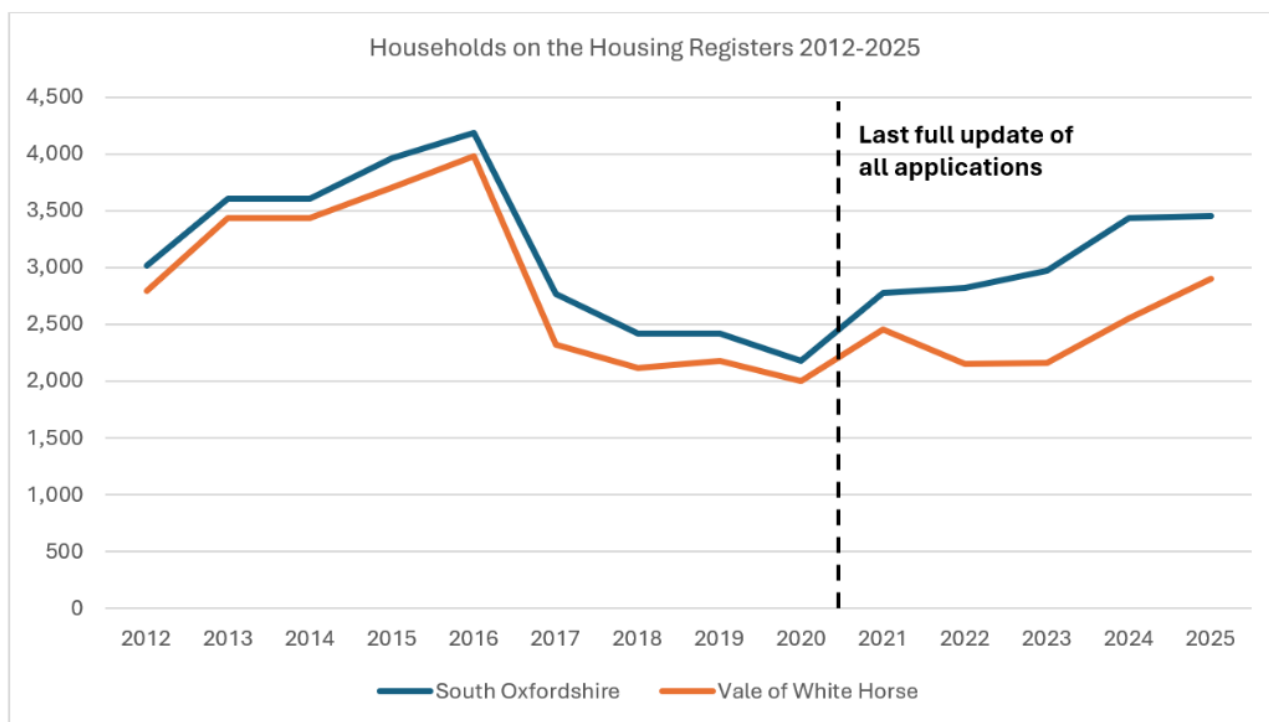
19. In ORS's professional judgement the updating on any piece of data does not invalidate previous research. For example, the 2022 based household projection were released in October 2025, and ORS published assessments for other councils in the summer of 2025. Those studies cannot be deemed to be out of date just because the new projections were released.
20. Some elements of the Joint Housing Needs Assessment data can be examined easily. For example the first 4 lines of data for Figure 46 covering South Oxfordshire current need show a net need from homeless households covering four different sets of circumstances of 5 households. The current figures from those categories would show a need from 9 households, so no meaningful change. The same figures are shown in Figure 47 for Vale of White Horse and the net need would rise from 6 households to 22 households, so less than 1 household per annum over the 18 year plan period.
21. **Error! Reference source not found.** and **Error! Reference source not found.** of the Joint Housing Needs Assessment show the housing registers for South Oxfordshire and Vale of White Horse by priority band since 2015. As we note in the report at paragraph 4.10,

4.10 ...We tend to place little emphasise on the housing register for any one year because councils often ask households to reapply to confirm that they are still seeking a property.
22. This view is supported by the Notes tab in MCHLG Live Table 600¹ which is the data for housing registers and states that:

The number of households on local authority housing registers (commonly known as waiting lists) is not the same as the number of households waiting for social housing. Local authorities periodically review their registers to remove households who no longer require housing, and the frequency of these reviews varies between local authorities. In addition, some households may be counted on the housing register of more than one local authority. It is therefore likely that the total number of households on housing registers will overstate the number of households who still require social housing at any one time.
23. Analysing the data from 2012-2025 from Live Table 600 (The Localism Act 2011 offered greater flexibility to local authorities as to who should be included on their register), the highest recent number for both registers was in 2016. That cannot be taken as the need for affordable housing being at its highest in 2016.
24. At any one time a range of factors will affect the housing register, including when the last full refresh occurred. In South Oxfordshire and Vale of White Horse, new applications are processed daily, but the last full refresh of the housing register occurred in 2021. Therefore, the current register will contain many households who joined the registers after 2021, but would be removed in a full refresh because their needs have been met elsewhere, or they are no longer seeking accommodation in the area.

¹ [Live tables on rents, lettings and tenancies - GOV.UK](#)

Figure 2: Households on the councils' housing registers 2012 to 2025



25. In practice, the only definitive or conclusive way to assess if new data has a significant impact on the findings of a Housing Needs Assessment is to run the whole assessment again. This would be time consuming, costly, and disproportionate, in the absence of any indication that there have been fundamental changes of circumstance in relation to the main factors informing housing needs. However, we can offer case studies from other areas as to the impact of this in relation to household projections.
26. In 2024 and 2025, ORS produced a range of studies which were either in draft form or completed before the 2022 based household projections were published for local authorities who were working towards publishing their local plans. A number of the planning authorities we worked with have subsequently decided to update their studies. This was to either ensure that they have the results covering a 15 year period from the proposed adoption of their plans in the same way the JHNA ran to 2041, or to ensure that the study is consistent with the time period of Local Plan submission, again in the same way as the JNHA.
27. In all cases the updated studies using the 2022 based household projections to inform the different components of housing need (such as older households, single person households, etc) produced slightly different outputs to those produced 3-18 months earlier using the 2018 based household projections, but in no case did the underlying narrative of the study change. On this basis, we would deem the studies to be consistent with each other such that we do not recommend updating studies unless a planning authority is seeking to have a clear 2 year window for a study which is consistent with the time period of their Local Plan.