



Planning Inspectorate

Examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041

**Inspectors: Dr Rachael A Bust BSc (Hons) MA MSc LLM PhD MLoL MCMI FGS
MIEnvSci MRTPI**

G J Fort BA PGDip LLM MCD MRTPI and

Caroline Mulloy BSc (Hons) DipTP MRTPI

Programme Officer: Mr Ian Kemp

Telephone: 07723 009166

Email: ian@localplanservices.co.uk

Address: PO Box 241, Droitwich, Worcestershire WR9 1DW

Website: [Joint Local Plan 2041 Examination - South Oxfordshire District Council and Vale of White Horse District Council](#)

15 September 2026

Dear Ms Murfett,

Inspectors' Post Stage 2 Hearings Letter

Preamble

1. This letter sets out our findings in respect of the topics covered in the examination of the South Oxfordshire and Vale of White Horse Joint Local Plan 2041 (the Plan) thus far and sets the context for its next phases, including the stage 3 hearings, which are due to commence at 9:30am on Tuesday 17 November 2026. It is intended to be helpful, and to maintain pace in the examination in line with the expectations set out in the Minister of Housing and Planning's Letters to the Planning Inspectorate of July 2024, October 2025 and July 2026.
2. Due to the legislative arrangements in place at the time, the first Post Hearings Letter (ID10) had a tight focus on the Duty to Cooperate, with only limited coverage in it of other matters considered during the stage 1 hearings. Accordingly, where necessary, this Letter may in some instances make recommendations for main modifications or further work relating to items covered in stage 1 of the examination.

3. A new National Planning Policy Framework (the Framework) was published in August 2026. However, it retains the transitional arrangements relating to plan examinations of the previous version of the Framework, published in December 2024. This means that the December 2023 version of the Framework remains the relevant version for the examination of this Plan. Accordingly, all subsequent references to the Framework are to the December 2023 version unless otherwise explicitly identified. Moreover, references to the Planning Practice Guidance (PPG) are to the version of that document relevant to the December 2023 Framework. Written Ministerial Statements (WMSs) and the December 2023 Planning Policy for Traveller Sites (PPTS) also remain part of the national planning policy context for this examination (see Annex A, paragraph 11 of the August 2026 Framework).
4. Aside from where we specifically request further actions from the Councils below, we are not expecting, nor will we accept, any other responses on the contents of this letter at this time.

Plan period and associated matters

5. The period covered by the Plan will not extend to the Framework's expected timeframe of 15 years post-adoption. The Councils are preparing a main modification which would extend the Plan period by a year. We are of the view that a main modification along these lines would achieve consistency with national policy on this matter.
6. Moreover, there are two key drivers which weigh in favour of adjusting the start of the Plan period also, and both relate to the housing aspects of the Plan. Firstly, local housing need for the Districts has been re-calculated in line with the advice included in the 'Housing and economic needs assessment' PPG (Paragraph: 008 Reference ID: 2a-008-20190220 Revision date: 20 02 2019) to a base date of 2025. Secondly, and importantly, in respect of the Plan's approach to meeting Oxford City's unmet need, the plan period of Oxford City Council's emerging local plan starts in 2025. This provides the base date of Oxford's housing needs assessment and for the calculation of the City's unmet need. As the PPG (Paragraph: 011 Reference ID: 2a-011-20190220 Revision date: 20 02 2019) is clear that the affordability adjustment included in the standard method calculation accounts for any past under-delivery, we are of the view that alignment of the Plan's housing base date to that of Oxford City would be necessary to provide an effective, positively prepared and justified approach to this matter. It follows that main modifications which adjust the Plan period's base date to 2025 are needed.
7. In preparing main modifications along these lines the Councils are to consider whether consequential modifications are needed to the Plan's policies and

reasoned justification, and indeed its title, which currently references the end of the Plan period as submitted. As discussed, this should include a consideration of whether amendment is needed to Policies SP1 and SP7 insofar as they relate to housing requirements for Thame, in the context of the information recently presented in LPA88.

8. The Councils will need to consider how main modifications giving effect to these changes to the Plan period may affect the sustainability appraisal and habitats regulations assessment. However, we are content that any necessary work along these lines could be carried out in any addenda to these documents produced to accompany any consultation on main modifications.
9. The Councils should also consider whether the wider evidence base, particularly documents relating to development needs and land availability, continue to provide a robust and proportionate evidential basis for the adjusted Plan period. It would be helpful for these considerations to be captured in a note, which should be made available ahead of the next stage of hearings. To be clear, however, as we have already received the Councils' position relating to the Joint Housing Needs Assessment (in LPA92), and discussed this further at September's Focused Hearing Session, we are not anticipating any further substantive coverage of this matter in the note.
10. At the stage 2 hearings we also discussed whether the Local Development Schemes (LDSs) should be amended to reflect the latest timetabling assumptions for the examination. When these adjustments are made, amendments should also be made to the description of the scope of the Plan so that it reflects the amended Plan period.

Housing supply

11. The Framework (at paragraph 69) anticipates that plans should demonstrate a five-year supply of deliverable housing sites from the anticipated date of adoption. The stage 3 hearings will consider this along with the developability of the sources of supply relevant to years 6 to 15 post-adoption. Assuming that the Plan would proceed broadly in line with the latest iteration of the LDS, the base date of the five-year supply calculation should be 1 April 2027. Accordingly, in order to assist with discussions of this matter at the next hearing phase the Councils should provide updated evidence on the deliverability/developability of the Plan's allocations and any other sites that may contribute to housing supply.
12. The Planning Inspectorate templates published in June 2026 provide a suggested format for such information <https://www.gov.uk/guidance/local->

[plans-housing-land-supply-evidence-december-2023-framework](#). As discussed, however, we are open to alternative ways of presenting this evidence, which would nevertheless include sufficient detail on deliverability and developability in line with the Framework glossary definitions of these terms and related advice in the PPG.

13. Where an allowance is made for windfalls as part of anticipated supply, there should be *compelling evidence* that they will provide a reliable source of supply. Any allowance will have to be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and *expected future trends* (paragraph 72 of the Framework with our emphasis). The Councils may wish to revisit their windfall assessment taking into account completions data since the submission of the Plan. In terms of expected future trends the potential effects of the Plan's spatial strategy and other policies on windfall rates should be reflected on, alongside any other relevant considerations.
14. In light of this work, main modifications to Policy HOU2 – Sources of housing supply may be necessary, and the Councils may wish to suggest the potential wording for these in advance of the stage 3 hearings. Changes to the housing trajectories in Appendix 4 of the Plan may also be required to take into account both the updated housing supply information and changes to the Plan period.

Strategic policies

15. The Framework anticipates where a Plan includes both strategic and non-strategic policies that strategic policies should be clearly identified as such. As submitted, the vast majority of the Plan's policies are identified as strategic. However, the Framework is clear that strategic policies should not extend to detailed matters that are more appropriately dealt with through non-strategic policies. We will re-visit this matter in our consideration of the Plan's policies during the next stage of the examination.

Energy efficiency and overheating policies

16. Amongst other things, our stage 3 hearings will consider the Plan's approach to climate change in soundness terms including its policies relating to the energy efficiency and ventilation of new buildings. Initial questions were asked about this in ID01, and the Councils' response was set out in LPA02. The Councils have also provided Topic Papers on this subject (TOP01, TOP01.1, TOP01.2). We note that the recent 'Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation' (August 2026), sets out that the government will not commence s43 of the Deregulation Act 2015 at this time,

which, if implemented, would have limited the Councils' ability to set local standards at a higher level than national ones.

17. With this and the following in mind, and to facilitate discussion at the stage 3 hearings, we now invite the Councils to update the TOP01 Topic Paper. Noting that the Topic Paper already considers the implications of the 'Planning - Local Energy Efficiency Standards Update' WMS of 13 December 2023, the following matters will be of particular relevance to the update:

- i) changes to the Building Regulations that seek to implement the Future Homes Standard (see [Building Circular 01/2026](#));
- ii) The Court of Appeal judgement *Rights Community: Action Limited, R (on the application of) v The Secretary of State for Housing, Communities and Local Government* [2025] EWCA Civ 990
- iii) The 'Housing Update' WMS of December 2021 (which is relevant to the Plan due to the transitional arrangements referenced in paragraph 3 above) insofar as it states that the "new overheating standard is a part of the Building Regulations and is therefore mandatory, so there will be no need for policies in development plans to duplicate this."

Biodiversity Net Gain

18. The Plan seeks a higher level of Biodiversity Net Gain than the nationally set requirement. Initial questions were asked about this in ID01, with a response set out in LPA02. The Councils also provided a Topic Paper (TOP04.1) to accompany the submission version of the Plan. The Councils should consider whether any update is necessary to the Topic Paper in light of recent and proposed changes to the types of development that the statutory metric will apply to. Any update to the paper should be ready in good time to facilitate discussion at the next round of hearings.

Local information requirements

19. Several of the policies require assessments or other information to be submitted with planning applications. We invite the Councils to review where this is the case and to set out in a brief note the justification for the requirements in the context of paragraph 44 of the Framework. The note should also reflect on whether documentation already required as part of applications, such as design and access statements, could include the information required by the policies without giving rise to the need for additional material to be submitted.

Concluding remarks

20. To re-cap, this letter recommends main modifications in addition to those that have already been identified in our hearing sessions and previous correspondence. These main modifications are required to amend the Plan period to set the base date at 2025 and to achieve the 15 year post-adoption coverage expected by the Framework (see paragraphs 5 to 8 above).
21. The following additional items are also necessary (with (i) to (v) required in advance of the stage 3 hearings):
- i) The Councils' note on whether the evidence base, particularly in terms of development needs and land availability, remains robust and proportionate in the context of main modifications to the Plan period (see paragraph 9 above)
 - ii) Housing supply evidence based to 1 April 2027 and related consequential actions (see paragraphs 11 to 14 above);
 - iii) An update to the TOP01 Topic Paper (see paragraphs 16 to 17 above);
 - iv) Any necessary update to the TOP04 Topic Paper (see paragraph 18 above);
 - v) A note on information requirements for planning applications arising as a result of the Plan (see paragraph 19 above)
 - vi) Updates to the LDS to reflect the modified Plan period and the examination timetable (see paragraph 10 above).
22. Assuming that you are content to continue the examination on the basis set out above, we will be in touch in due course with our Matters, Issues and Questions and related documents for the stage 3 hearings.
23. As ever, if the Councils require any further clarification on the above, please do not hesitate to contact us via the programme officer.

Yours sincerely,

Rachael A Bust, G J Fort and Caroline Mulloy

INSPECTORS