
**ANNEX 1 TO PLANNING APPEAL PROOF
OF EVIDENCE: FIVE YEAR HOUSING
LAND SUPPLY**

**LAND NORTH OF READING ROAD,
ARBORFIELD**

**Appeal against the decision of Wokingham
Borough Council to refuse outline planning
permission for up to 111no. dwellings with
associated works, parking, landscaping,
publicly accessible open space, with access
from Reading Road (All matters reserved save
for means of access)**

Prepared by: Woolf Bond Planning Ltd

On behalf of:

Dandara Southern Ltd and Elstree Land Ltd

PINS Ref: APP/X0360/W/25/3371069

LPA Ref: 243099

WBP Ref: 9015

February 2026



Woolf Bond Planning
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1.0 Introduction

Overview

- 1.1. This Annex on Housing Land Supply has been prepared alongside the Appellant's Proof of Evidence on overarching Planning Matters in support of an appeal ("the Appeal") against the decision of Wokingham Borough Council ("the Council") to refuse the outline application ("the Application").
- 1.2. The Application proposed erection of up to 111 no. dwellings (including 40% affordable housing) with associated works, parking, landscaping, publicly accessible open space and access from Reading Road (LPA Ref: 243099) ("the Application Scheme", now "the Appeal Scheme") on land north of Reading Road, Arborfield ("the Application Site", now the "Appeal Site"). All matters other than access are reserved.
- 1.3. Wokingham is an authority which is unable to demonstrate a five-year supply of housing land, in conflict with the requirement at paragraph 78 of the National Planning Policy Framework (NPPF) to identify and update annual a supply of specific, deliverable sites sufficient to provide a minimum of five year's worth of housing against the local housing need figure. The inability to demonstrate such supply is contrary to the Government's aim, as set out in paragraph 61 NPPF, to significantly boosting the supply of homes.
- 1.4. The shortfall, in this case, is significant. The Council's own calculation of the supply position over the 5 year period from April 2025 to March 2030 is no more than 2.5 years (a deficit of some 3,456 homes). This is irrespective of the appellant's doubts over the deliverability of various sources of supply. Either way the scale of the deficit is vast and represents a very onerous task in terms of seeking to address the shortfall. By our estimation the Council has only 2.3 years' supply of deliverable housing sites.
- 1.5. The Council's housing land supply deficit has been ongoing for several years as explained in this annex.

- 1.6. Although an overview of Housing Land Supply matters is covered in the “Affordable Housing and Housing Land Supply Statement of Common Ground”, this Annex provides information detailing the Appellant’s position in respect of the need and supply of housing, especially in the context of the five year position from 1st April 2025 to 31st March 2030.

Housing Land Supply Position - Overview

- 1.7. Whilst the Council accepts that they are unable to demonstrate an adequate supply of deliverable housing land, the appellant’s position is that the extent of the shortfall is greater than that accepted by the Council. The Council’s latest position statement (August 2025) concluded that there is a deliverable housing land supply of only 2.5 years during the period April 2025 to March 2030 (**CD6.22**). Further (and as accepted by the Council), the Borough’s housing requirement is to be determined through the standard method as detailed in NPPF paragraph 78.
- 1.8. Although the Council suggests that its deliverable supply is 3,453 dwellings resulting in a current (2025-30) five-year provision of 2.5 years, the appellant disputes the expected contribution from certain sites. This is due to the Council’s approach not being supported by the necessary evidence as required by the relevant guidance.
- 1.9. The appellant’s analysis reduces the expected supply by 272 dwellings from 3,453 dwellings to 3,181 dwellings. This reduces the supply to 2.3 years.
- 1.10. Table 1 provides a comparison of the conclusions reached by the Council and Appellant with respect to the housing land supply position.

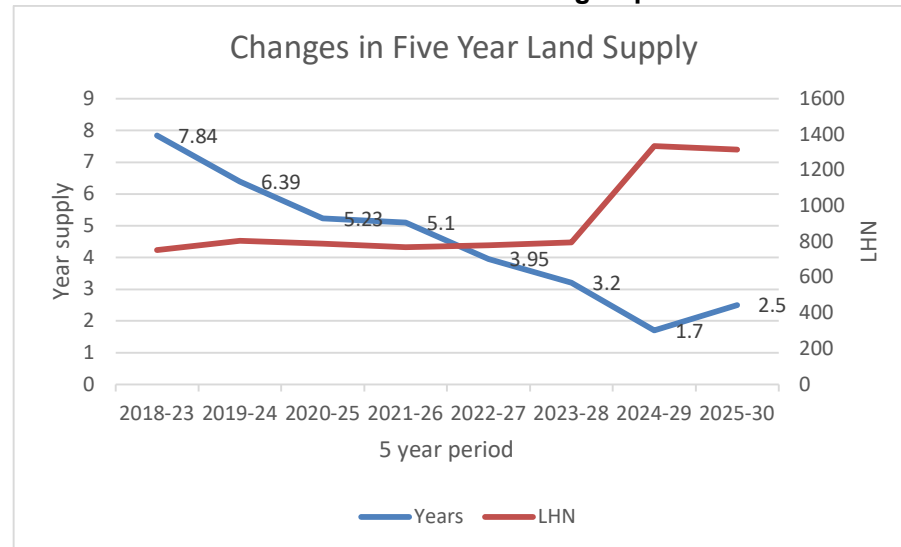
Table 1: Housing Land Supply Position – Comparison

Step	LPA	WBP
A - Annual requirement (1/4/25 – 31/3/30)	1,316	1,317
B - Base year Requirement: (1/4/25 – 31/3/30) (A x 5)	6,580	6,585
C - Add 5% buffer pursuant to HDT (B x 5%)	329	329
D – Final five year requirement (1/4/25-31/3/30) (B + C)	6,909	6,914
E - Annual requirement (1/4/25 – 31/3/30) (F/5)	1,381.8	1,382.8
F – Deliverable supply (1/4/25 – 31/3/30)	3,453	3,181
G - No. Years Supply (F/E)	2.50	2.30
H - Extent of Surplus / Shortfall compared to 5 year requirement (F – D)	-3,456	-3,733

1.11. Table 1 confirms that the Council accepts it is unable to show a five-year supply for the period 2025 to 2030. This situation has been ongoing for several years.

1.12. Table 2 and associated chart (below) illustrate that based upon the Council's Assessment of Housing Land Supply¹, it has accepted since the appraisal for the period April 2022-March 2027 its inability to show five year supplies. Through appeal decisions, independent assessments have shown that deficits have existed longer.

Comparison of five year land supply positions as assessed by Council since Standard Method established housing requirements



¹ Including that for April 2024 (CD07.34) and April 2025 (CD06.12)

Table to accompany chart of land supply assessment comparison.

	Apr 2018 - Mar 2023	Apr 2019 - Mar 2024	Apr 2020 - Mar 2025	Apr 2021 - Mar 2026	Apr 2022 - Mar 2027	Apr 2023 - Mar 2028	Apr 2024 - Mar 2029	Apr 2025 - Mar 2030
Years	7.84	6.39	5.23	5.1	3.95	3.2	1.7	2.5
LHN	752	804	789	768	781	795	1,336	1,317
Council's contended deliverable supply	6,193	5,398	4,332	4,115	3,237	2,545	2,321	3,453

- 1.13. Table 2 and the associated chart are therefore clear that the failure to show five year supplies has been a long standing issue for the borough. This failure has been in place for half the period since 2018 when a Standard Method for determining housing requirements was established in the NPPF.
- 1.14. Table 2 indicates that the failure to show five year supplies is a consequence of the diminishing pool of deliverable sites. As indicated in the overarching Planning Proof of Evidence, the quickest solution to addressing the ongoing deficit is the approval of more applications, such as the appeal scheme for which deliverability can be confirmed by the granting of permission.

2.0 Identified Local Housing Need and 5 Year Housing Land Supply Position

Overview

- 2.1. The Council accept that they cannot demonstrate the necessary 5-year supply of housing land as detailed in their Land Supply Assessment (**CD6.12**). They have prepared a land supply assessment, for the period April 2025 to March 2030, that suggests a 2.5 years' supply.
- 2.2. The Council's assessment recognises (consistent with the approach of the Council in their Land Supply assessment published August 2025) that the Borough's housing requirement is now set through determination of the Local Housing Need consistent with the methodology in NPPF paragraph 78 (given the Local Plan setting housing targets (the Core Strategy) passed its fifth anniversary on 29th January 2015 i.e. more than 10 years ago).
- 2.3. Applying the formula specified in the PPG accompanying the NPPF to determine the Borough's Local Housing Need results in an annual requirement for 1,317 dwellings.
- 2.4. For step 1, the most recent information on dwelling stock for Wokingham Borough was issued on 22nd May 2025. This indicates² that Wokingham Borough had 74,654 dwellings in 2024. The calculation of 0.8% within Step 1 results in a baseline figure of 597.232³.
- 2.5. For Step 2, the most recent median workplace based affordability ratios were published on 24th March 2025. The five year average figure in Table 5C (2020-2024) for Wokingham Borough was 11.34⁴. Applying the specified formula results in an affordability adjustment of 2.2046⁵.

² Table 125 (unrounded)

³ Consistent with first part of Table in Appendix 1 of the Council's Housing Land Supply Statement (July 2025) (CD06.12)

⁴ Consistent with second part of Table in Appendix 1 of the Council's Housing Land Supply Statement (July 2025) (CD06.12)

⁵ The third part of the Table in Appendix 1 of the Council's Housing Land Supply Statement (July 2025) (CD06.12) suggests that this is 2,2039, rather than 2.2046 as advanced by the Appellant.

- 2.6. The resulting Local Housing Need figure is therefore 1,317 dwellings⁶.
- 2.7. Including the necessary 5% buffer means that the 5-year target increases to 6,191 dwellings (1,382.8dpa). The 6,191 dwellings requirement figure reflects that in Table 1 of this Annex.

Deliverability of Sources of Supply - Guidance

- 2.8. In assessing the robustness of the Council's delivery assumptions, it is also appropriate to take account of the guidance in the NPPF, the accompanying PPG and the conclusions of Inspectors on these matters in relevant planning appeals.
- 2.9. Primarily, the NPPF "Glossary" defines "Deliverable" as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 2.10. With respect to the second category of sites, the PPG on "Housing supply and delivery", states under the heading "What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking"? ⁷

⁶ 597.232 (0.8% of the unrounded dwelling stock) x 2.2046 (the affordability adjustment)

⁷ ID ref 68-007-20190722

In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;
- are allocated in a development plan;
- have a grant of permission in principle; or
- are identified on a brownfield register.

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.

- 2.11. Whilst the difference in the NPPF's definition of a 'deliverable' site has changed over time, it is also important to emphasise the nature and scope of evidence necessary to allow for inclusion of sites, especially where they are outside of "Category A". This is pertinent to the consideration of Wokingham Borough's housing supply, as detailed below, especially given the onus is upon the Local Authority to demonstrate deliverability for sites outside of Category A. In short, in the absence of clear evidence, it is only category A sites that a Council can rely upon as a 'deliverable' site for the purposes of housing land supply calculations. As the NPPF's Glossary definition of deliverable sites within Category A, there can be circumstances where even sites in this group of

sources are considered undeliverable for the purpose of 5 year housing land supply⁸.

- 2.12. In this context, reference is specifically made to the need to consider “long term phasing plans” and the implications of this for overall delivery. In the context of phasing plans, a number of appeal decisions emphasise the need to sense check the assumptions and expectations detailed. These include decisions for land at Park Lane, Charvil (allowed 2nd March 2017) (CD10.04)⁹, on land east of Butts Road, Ottery St Mary (allowed 14th December 2012) (CD11.02) ¹⁰ and on land west of Park Farm, Thornbury, South Gloucestershire (allowed 11th February 2023) (CD11.03)¹¹.
- 2.13. The appeal decision for Park Farm, Thornbury (CD11.03) is of particularly relevance to the consideration of a Category A site and the reasonableness of the delivery rate assumptions (paragraphs 81 and 82). In that case, the expected delivery was reduced from 1,487 dwellings to 955 dwellings (reduction of 523 dwellings as per paragraph 82 of the decision). This equated to 191 dwellings annually, or the highest rate achieved historically on the site (as referenced in paragraph 81 of the decision).
- 2.14. The reasonableness of expected delivery rates whilst relevant to phasing plans as indicated in Category A also applies to the consideration of the assumptions for construction on Category B sites.
- 2.15. Along with delivery rates, the nature and quality of evidence to substantiate expected delivery from Category B sites have been considered in a number of landmark appeal decisions as summarised below.

Appeal Decision at Little Sparrows, Sonning Common

⁸ The text in brackets – they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans

⁹ PINS ref APP/X0360/W/15/3130829 – this was a scheme in Wokingham Borough

¹⁰ PINS ref APP/U1105/A/12/2180060

¹¹ PINS ref APP/P0119/W/21/3288109

- 2.16. One landmark appeal regarding the nature and quality of evidence required to evidence deliverability forms a scheme at Little Sparrows, Sonning Common, Oxfordshire¹² allowed on 25th June 2021. The Inspector's review of the type of evidence needed is contained at paragraphs 20 and 21 of the decision:

I have also had regard to the PPG advice published on 22 July 2019 on 'Housing supply and delivery' including the section that provides guidance on 'What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking.' The PPG is clear on what is required:

"In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions."

This advice indicates to me the expectation that 'clear evidence' must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.

Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are there planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed. Securing an email or completed pro-forma from a developer or agent does not in itself constitute 'clear evidence'. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward. (Our emphasis)

Appeal Decision for land off Colchester Road, at Bures Hamlet, Essex (CD11.10)¹³

- 2.17. At paragraphs 66 to 67 of the Bures Hamlet appeal decision (dismissed 27th March 2019), the Inspector found.

"Where there is to be a reliance on an annual assessment then that clear evidence should logically be included in that published assessment or at least published alongside it.

¹² Site is in South Oxfordshire District, which immediately adjoins Wokingham Borough to the north.

¹³ APP/Z1510/W/18/3207509

That would qualify as publicly available in an accessible format as the PPG requires. It would accord with guidance in PPG Paragraph 3-048 which applies to all forms of annual review including, but not limited to, annual position statements. That is not to say there should be publication of every email or every note of a meeting or telephone conversation. The information can be provided in summary form but there needs to be some means of identifying the basis for the conclusion reached.

The information published here in the AMR is minimal and it relies heavily on unsupported assertions that a site will be delivered. That does not amount to clear evidence. In most cases it does not include the additional information that was introduced only in oral evidence at the inquiry such as: the date when a reserved matters submission was made or anticipated; when a S106 obligation was completed; why a full planning application and not a reserved matters application was submitted on a site that already had outline permission; the source of an estimate of a delivery rate; any assumptions and yardsticks that were applied where direct information was in doubt or missing; or other information of the type suggested in PPG paragraph 3-036.”

Appeal Decision at Land at Caddywell Lane / Burwood Lane, Torrington, Devon¹⁴ (CD11.11)

- 2.18. Paragraph 56 of the Torrington Inspector’s decision (allowed 18th March 2020) commented on what is required by the PPG when assessing a Category B site and states:

This indicates the expectation that ‘clear evidence’ must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned. (Our emphasis)

- 2.19. These decisions reinforce the importance of clear evidence to support the asserted deliverability of sites/sources within the supply. Therefore, having regard to these appeal decisions, for any site not included within the first category of sources detailed in the NPPF Glossary, it is important that this is

¹⁴ Ref. APP/W1145/W/19/3238460

substantiated by the necessary “clear” evidence of “deliverability”, as outlined in the PPG¹⁵.

- 2.20. Taking account of the guidance in the NPPF and the conclusions of appeal Inspectors, specific sites and sources where the contended delivery is not justified that supply should be omitted from an HLS. Especially given “clear evidence” must be something cogent, as opposed to simply mere assertion. We have reviewed the sites within the land supply assessment (both Category A & B) to establish the realism of expected delivery rates and lead in times (as applicable) to determine whether the Council’s assumptions are realistic. It is within this context that the Council’s HLS position is reviewed below.

Assessment of Wokingham Sources of Supply

- 2.21. For each of the three sites which the Appellant disputes the expected lead in times and delivery rates have been assessed using the benchmark rates detailed on pages 17 and 21 (respectively) of the Council’s Housing Land Supply Statement (August 2025). Consistent with the conclusions of the aforementioned appeal Inspectors, in the absence of clear evidence to the contrary, especially taking account of the clear conclusions of Inspector in the Charvil and Ottery St Mary appeals, it is essential to sense check the expectations. The Appellants application of the Council’s own evidence on these matters for these three sites therefore accords with this advice.

*Disputed Site 1: Parcel R10, land at phase 2b of South Wokingham SDL.
Reduction of 53 dwellings*

- 2.22. For Parcel R10, the reserved matters application by Miller Homes for 215 dwellings (250399) was approved on 23rd June 2025. Allowing the average 18 months from reserved matters approval to first house sale means that the initial completion on the site would be at the start of 2027. Thereafter, given the site is part of the wider S Wokingham SDL, output of 50dpa is feasible. The difference in delivery forecasts from this site during the five years is therefore shown below.

¹⁵ See Housing Supply and Delivery section (ID 68-007-20190722)

Year	2025/26	2026/27	2027/28	2028/29	2029/30	Total
LPA	0	20	65	65	65	215
WBP	0	12	50	50	50	162

*Disputed Site 2: Parcel R11, land at Phase 2b of South Wokingham SDL.
Reduction of 181 dwellings*

- 2.23. For Parcel R11, the reserved matters application by Kier Developments for 343 dwellings (250678) was approved on 23rd September 2025. Allowing the average 16 months from reserved matters approval to first house sale means that the initial completion on the site would again be at the start of 2027. Thereafter, given the site is part of the wider S Wokingham SDL, output of 50dpa is feasible. The difference in delivery forecasts from this site during the five years is therefore shown below.

Year	2025/26	2026/27	2027/28	2028/29	2029/30	Total
LPA	0	97	78	112	56	343
WBP	0	12	50	50	50	162

Disputed Site 3: Land at Bridge Farm, Bath Road, Twyford. Reduction of 38 dwellings

- 2.24. For the land at Bridge Farm, the reserved matters application by Croudace Homes for 200 dwellings (243124) was approved on 19th June 2025. Allowing the average 18 months from reserved matters approval to first house sale means that the initial completion on the site would be at the start of 2027. Thereafter, given the site is opposite the David Wilson/Barratt developments site, output of 50dpa is feasible. The difference in delivery forecasts from this site during the five years is therefore shown below.

Year	2025/26	2026/27	2027/28	2028/29	2029/30	Total
LPA	0	30	55	55	60	200
WBP	0	12	50	50	50	162

- 2.25. On that basis, it is considered appropriate to reduce the expected supply from these three sites by 272 dwellings resulting in a maximum of 3,181 dwellings' supply. This therefore equates to 2.3 years' housing land supply.

Conclusions on deliverable housing supply

- 2.26. Table 3 below provides the comparison of the conclusions of the Council and Appellant with respect to housing land supply.

Table 3: Housing Land Supply Position – Comparison

Step	LPA	WBP
A - Annual requirement (1/4/25 – 31/3/30)	1,316	1,317
B - Base year Requirement: (1/4/25 – 31/3/30) (A x 5)	6,580	6,585
C - Add 5% buffer pursuant to HDT (B x 5%)	329	329
D – Final five year requirement (1/4/25-31/3/30) (B + C)	6,909	6,914
E - Annual requirement (1/4/25 – 31/3/30) (F/5)	1,381.8	1,382.8
F – Deliverable supply (1/4/25 – 31/3/30)	3,453	3,181
G - No. Years Supply (F/E)	2.50	2.30
H - Extent of Surplus / Shortfall compared to 5 year requirement (F – D)	-3,456	-3,733

- 2.27. As indicated in Table 3, the Council asserts it can demonstrate a maximum deliverable supply of 3,453 dwellings. This only provides for 2.50 years supply (a shortfall of 3,456 dwellings). In contrast, the appellant's assessment of deliverable supply comprises 3,181 dwellings and means that only 2.30 years are demonstrated, a shortfall of 3,733 dwellings.

3.0 Conclusion

- 3.1 Whilst the Council accepts they are unable to demonstrate an adequate supply of deliverable housing land, the appellant's position is that the extent of the shortfall is greater than that accepted by the Council.
- 3.2 The Council's latest position statement (August 2025) concluded that there is a deliverable housing land supply of only 2.5 years during the period April 2025 to March 2030.
- 3.3 The appellant's position is that since not all the contended supply is deliverable, it should be reduced to 3,181 dwellings which equates to a maximum of 2.3 years.
- 3.4 These figures are reflected in the Affordable Housing and Housing Land Supply Statement of Common Ground.
