

Email for the attention of the Planning Officer development.control@wokingham.gov.uk

Submitted 28th August, 2026

Re: St Nicholas Hurst Parish Council submission in respect of Application 261841 - Land at Forest Road, Wokingham, RG40 5SA. PIP for a range of 3 to 4 residential dwellings.

St Nicholas Hurst Parish Council (SNHPC) **object** to this PiP Stage 1 application for the following reasons:

1. Inaccurate Context Drawing.

Whilst SNHPC understand that each planning application must be decided on its own merits, SNHPC note that there is concurrently another Planning in Principle (PiP) application (261842) within close proximity (21.65 metres) east of this site submitted by the same agent for Curtis Bank SIPP which is for 4 dwellings (no range stated which is required by PIP guidance). Should both applications be allowed then the cumulative effect of these two applications would be exponentially substantially harmful to the rural landscape.

The Context Plan MLP02 (December 2025) submitted by the applicant implies that there are already 4 dwellings to the east of the proposed site, when in fact these 4 dwellings do not exist and do not have permission as they are the subject of application 261842 which is currently a greenfield site. The nearest dwelling approximately 20 metres away from the site is 'Tailend' (although now appears to be called 'Rosenhurst'). See images below comparing the context Plan MLP/02 and WBC Planning Map:



Application 211699 for reroofing of 'Rosenhurst', regarding Landscape, WBC commented as follows: 'The site forms a boundary with open fields and hedgerows. It is important that the boundary treatment to the eastern site boundary is retained as vegetation rather than wholly

close boarded fence'. This acknowledges that there is no further development beyond the eastern boundary of 'Rosenhurst'. The gap between the proposed site and nearest dwellings is far more than the applicant would suggest as the nearest property to the East of the site on the same side of the road is in excess of 310 metres (Saxon Forest Court). This proposal is not an infill site and it does not qualify as a rural exception site.

2. This application conflicts with both the current development plan the emerging WBC Local Plan Update (LPU) and National Planning Policy Framework.

By virtue of its location represents unacceptable unplanned development outside of development limits within the designated countryside which is contrary to the spatial objectives of the development plan. The proposal is contrary to policies CP1, CP2, CP3 CP6 and CP11 of the Core Strategy (2010), CC01, CC02 and CC03 of the MDD (2014) and the Borough Design Guide Supplementary Planning Document and the NPPF (2026). The proposal by virtue of its location and amount of development would fail to suitably assimilate into the established landscape and character of the surrounding area and would fail to retain and enhance the area as it would have a significantly urbanising effect on the rural character and will be harmful to the Green Route.

- a) **Conflict with WBC Core Strategy Policy CP11 – Proposals outside Development Limits (including countryside)** in that the site is outside the settlement/development limit of Hurst and does not meet any of the exception criteria.
- b) **Conflict with WBC CS Policy CP1 and NPPF – Sustainable development** in that it does not:
 - Maintain or enhance the high quality of the environment.
 - Ensure the provision of adequate drainage.
 - Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6.

Contrary to the applicant's statement, the proposed site is not sustainable. Just because the applicant suggests that the site is not very far away from other places, buildings and people, the fact remains that all of the new occupants will be wholly reliant on the private motor car to access facilities, such as stations, large supermarket, doctor, dentist and schools.

As detailed in the applicants Table in their Planning Statement paragraph 4.26, the round trip is at least 2 miles to and from the small number of shops at Binfield Centre. The applicant confirms that the King's Academy is oversubscribed and out of catchment as will the nearest Binfield Primary School as both are in Bracknell Forest Borough Council.

There are no improvements within the proposal to finding alternative safe and reasonable modes of transportation other than the motor car.

This proposal is not on a bus route, there are narrow pathways only on one side of the road where the site is proposed, which are not wide enough in places for 2 people to pass or a parent with a buggy and child, or a wheelchair user to use safely; they are not continuously on the same side of the busy B3034. There are no pathways to the village of Hurst once pedestrian reaches the roundabout with Maidenhead Road/Warren House Road neither of these roads have pathways. The B3034 Forest Road is a well-known route for commuters to avoid central Wokingham when travelling from Bracknell to journey towards A4/M4/Twyford Station/ Woodley and beyond. It is busy and fast.

SNHPC authorised a traffic survey with Traffic Survey Partners (TSP) along the Forest Road between 22nd September and 28th September, 2022 (**APPENDIX 1**). The survey revealed that over the 7 days Eastbound Traffic there were 20,334 vehicle movements of which 48.67% exceeded 40 mph and Westbound there were 21,443 vehicle movements of which 54.34% were over 40 mph. This survey was on the straight area of Forest Road within 100 metres of the PIP application site and provides evidence that there is persistent speeding along the Forest Road. Since then, more houses have been built in both Bracknell and Wokingham and the amount of traffic and speeding has undeniably increased exponentially. This confirms that this is a busy and fast route which only very confident cyclists would use as there are no designated cycle ways along this road and you cannot utilise the pathways for cycling.

NPPF (2026)¹ confirms that a 'reasonable' walking distance is 800 metres when relating to developing land around stations and 400 metres for Hot food takeaways. Therefore, it is not unreasonable to use these NPPF (2026) distances when accessing other facilities, such as GP surgery, dentist, vet etc. The walk to Binfield and any other facilities is in excess of these NPPF distances, without including the return journey.

c) Conflict with *WBC CS Policy CP9* – Scale and Location of development proposals in that this is not a rural exception site and the location is inappropriate for a designated limited location such as Hurst.

¹ Annex B: Glossary

d) Conflict with NPPF (2026) S1 Paragraph 1 and S2 – The planning system should be genuinely plan-led. This is a speculative planning application which does not accord with the current or future spatial strategy for Hurst or Wokingham Borough.

3) Conflict with Emerging LPU Policy SS5 Development in the Countryside.

This proposal conflicts with Emerging policy SS5 as it does not satisfy any of the requirements including but not excepting:

- 2a) It is not an exception site
- 2b) It is not a site for which land is allocated
- 3. It does not take a landscape led approach as it will harm the rural character and landscape setting.
- 3b) It is not of the scale, nature and location that is appropriate.
- 3c) It is not sited and designed to minimise visual impact.
- 3g) It does not maximise opportunities to make the location more sustainable.

SS5 Paragraph 5.24 and 5.25. It does not prevent the proliferation of development in an area away from defined settlements. This is unplanned growth which has great reliance on the private car use for travel. It does not help to protect the identity of the area or respect the landscape character.

SS5 Paragraph 5.27. This is a greenfield site and there is no re-use of existing buildings.

4) Harm to the Landscape:

The application will be significantly harmful to the rural character and landscape which is designated as a green Route in the current development plan (CC03) and is designated countryside.

The applicant believes that the *'...straight configuration of the Forest Road will allow for good visibility when egress from the site is taken and turning into the dwellings will be safeguarded by this visibility'*. It must be noted however, that this part of the Forest Road because it is straight, also has very fast traffic, using the SNHPC supporting evidence (**APPENDIX 1**) confirms how busy and fast the traffic was along the Forest Road in 2022.

Therefore² according to the Design Manual for Roads and Bridges, the additional access(es) will need approximately a combined minimum sightline of 240 metres with a setback of 2.4 metres for the visibility splays to make the exit and entrance safe. Not only would the introduction of the visibility splays be harmful to the Green Route and the rural nature of the landscape, but

² According to the requirements for a 40 mph Classified 'B' Road in the UK, the standard national design guide (following the Design Manual for Roads and Bridges) DMRB.

also the combined requirement of the visibility splays are wider than the proposed site, which would necessitate attaining third party permission.

The illustrative layout is irrelevant at PiP Stage 1 and could easily be altered at Pip TDC (Stage 2). However, this does confirm that whatever formation they introduce into the countryside, the visual amenity of Tippens Wood and the overall rural character will be significantly, detrimentally affected by this proposal.

5) Discrepancies within the Preliminary Ecological Appraisal (PEA)

The PEA fails to mention that according to the DEFRA MAGIC Map the site is a protection area for Lapwing and Grey Partridge Priority Species.

It also omits to mention that this site is designated within the Berkshire Local Nature Recovery Strategy (LNRS)³ as an ACB i.e. an area which could become of importance to biodiversity within Berkshire; This LNRS area, including the proposed site, forms a natural wildlife corridor from the fields south of the site through to the adjacent Tippens Wood which the LNRS has already designated as important to biodiversity.

The LNRS is recognised by the NPPF (2026) as a system of spatial strategies for nature and environmental improvement required by law under S.104 of the Environment Act 2021 and must be taken into account when calculating the BNG metric and the impact of any future development.

6) No further sites are required for the emerging LPU

The applicant argues that there is a Housing Land Supply (HLS) shortage, however, with the LPU hearings now completed, the Inspectors Post Hearing Letter dated 4 August, 2026 (**APPENDIX 2**) Paragraph 12 clearly states that it is not necessary to allocate any further sites for housing in the Plan:

*‘To reflect these changes, an updated housing trajectory should be prepared to replace the one in Appendix F, as a main modification to the Plan. The supporting evidence should also be updated and made available at the time of the main modifications consultation (see paragraph 15 below), as an update to document WBC27. **Notwithstanding the above, and for reasons we will detail in our final report on the examination, we are satisfied that it is not necessary to allocate any further sites for housing in the Plan for it to be sound**’* ([SNHPC embolden]).

³ [Berkshire Local Nature Recovery Strategy Map](#)

7) WBC's Housing Land Supply Trajectory Update (March 2026)

Currently the deliverable housing land supply (HLS) is calculated against the national standard method which calculates local housing need (LHN) for Wokingham Borough to be just over 1,300 homes a year. The Local Plan Update (LPU) is currently being examined, and on its adoption the housing requirement set out in the LPU will be used. **As the plan was prepared under now superseded national planning policy, currently the housing requirement is circa 751 homes a year (Policy SS10 of the LPU).**

The applicant quotes the March 2025 HLS, but since then, important evidence has come to light at the ongoing emerging LPU Examination: On 19th May, 2026, WBC submitted their (WBC 27B) *Housing Trajectory Update Table showing the current housing land supply at 31 March, 2026*⁴ (**SNHPC Appendix 3**). This confirms that the **deliverable housing land supply (HLS)** for period 1 April 2026 to 31 March, 2031 (with a 20% Buffer included) is between **5.5 and 6.2 years**, depending on the calculation.

The accompanying explanation also submitted as evidence on 19th May, 2026 (WBC 27A) *Explanation of Differences between WBC 25 and 27*⁵ (**SNHPC Appendix 4**) supports the anticipated timing of housing delivery of the plan period 2023 -2040.

In addition, the above evidence is clearly demonstrated in WBC's response statement set out in *Question 2 (Page 5) of Matter 5: Housing Land Supply* (**SNHPC Appendix 5**)

The strategic planning for the LPU has been agreed by the Examiners and as the LPU is at such an advanced stage, in this instance, the LPU HLS figures should carry significant weight. Thus, at the date of this application, moving forward, there would currently appear to be no housing land supply shortage in Wokingham Borough and no justification to build 4 dwellings on a site such as this.

In addition, WBC have commenced work (30 June 2026) on the new-style Local Plan⁶ including the call for sites on 6th July, 2026 (until 1 September, 2026) to ensure that they comply with any immediate review once the LPU has been adopted.

To summarise:

⁴ [Up to date Housing land supply 2026.pdf](#)

⁵ [017f5b_df276c11daef4f35a53f51f0a2fc797b.pdf](#)

⁶ WBC Local Plan 2045

There is very little benefit gained from this speculative proposal. The small amount of additional housing is no longer needed as Paragraph 12 of the Inspectors Letter dated 4th August, 2026 confirms that no further housing allocation is required for the LPU and that with a small amount of mandatory changes, the LPU is sound and ready for adoption in the early part of 2027.

Therefore, the emerging plan does carry some weight. The location is not sustainable, there is no public transport available, the walking distances (including the return journey) to and from the small range of facilities are over and above those that are 'reasonable' and cycling is unsafe due to the large volume of speeding traffic. There is harm to the landscape and it conflicts with the LNRS. There is no justification for a site such as this.

With the reasons stated above SNHPC request that this application be refused.

APPENDICES

- 1. TSP Data for speeding along Forest Road**
- 2. LPU Post Hearing Letter dated 4 August, 2026**
- 3. WBC 27B Tables 1 & 2 HLS position 31 March, 2026**
- 4. Explanation of differences between WBC25 and WBC27**
- 5. WBC LPU Response to Matter 5 HLS**



EXAMINATION OF THE WOKINGHAM LOCAL PLAN UPDATE

Inspectors: T Hatfield BA (Hons) MA MRTPI and M Philpott BA (Hons) MA MRTPI

Programme Officer: Ian Kemp

Email ian@localplanservices.co.uk

Ian Bellinger
Head of Planning Policy
Wokingham Borough Council
Shute End
Wokingham
Berkshire
RG40 1WR

4 August 2026

By email via the Programme Officer

Dear Mr Bellinger,

INSPECTORS' POST HEARINGS LETTER

1. Following the conclusion of the recent Part 2 hearing sessions, we are writing to present our views on certain matters and set out the way forward in relation to the examination of the Wokingham Local Plan Update ('the Plan').
2. Firstly, we would like to thank the Council for the way in which you have assisted in the examination of the Plan, for ensuring that the hearings ran smoothly, and for the work that has been undertaken to address matters raised during the examination.
3. At this stage, we consider that the Plan is likely to be capable of being found sound and legally compliant subject to main modifications, which are those we indicated as being necessary in the hearings, as well as those set out below. However, this conclusion is subject to the outcome of Sustainability Appraisal and Habitats Regulations Assessment of, and formal consultation on, the main modifications.

Valued Landscapes

4. We acknowledge that valued landscapes exist across the borough and that these have been important considerations in the determination of planning applications and appeals. However, having reflected on the evidence presented, we find that the proposed formal designation of valued landscapes across the borough in the Plan is not justified. This designation, including Policy NE6 and the associated mapping at Appendix I, should therefore be deleted from the Plan. Accordingly, no further hearings to discuss individual valued landscapes or their boundaries are necessary.
5. In our view, the Valued Landscapes Assessment [LA4] ('VLA') fails to justify the identification and spatial extent of each proposed valued landscape. Key methodological concerns include a lack of clear rationale for selecting and scoring different physical attributes to inform the 'hotspot' mapping in Appendix 2 of the VLA; how that mapping is displayed, interpreted, and informs later stages of the assessment; and for taking forward the highest scoring 25 percent of landscapes for detailed appraisal. There is also insufficiently clear and robust justification for the ways in which attributes not reflected in the hotspot mapping are weighed and factored into the assessment. Furthermore, the VLA does not demonstrate that the potential valued landscape factors and indicators in the Guidelines for Landscape and Visual Impact Assessment (Third Edition) and Technical Guidance Note 02/21 have been coherently or consistently applied in appraising the individual or relative merits of each landscape.

Housing Land Supply

6. We find that the housing land supply assumptions are broadly robust and justified. However, a number of specific adjustments are necessary.
7. Firstly, the proposed windfall allowance relating specifically to Wokingham Town Centre is not justified. In this regard, compelling evidence has not been presented to support the assumed uplift in windfall completions in Wokingham Town Centre, compared to historic delivery rates. Moreover, the small sites windfall allowance is based on projecting forward a trend that includes delivery in Wokingham Town Centre. Accordingly, the Wokingham Town Centre element of the windfall allowance should be removed from the housing land supply.
8. In addition, the inclusion of Gypsy and Traveller pitches within the housing land supply is not justified. These pitches are subject to a separate policy context in the form of Planning Policy for Traveller sites, and a separate 5 year supply requirement. Moreover, whilst Planning Practice Guidance states that older peoples' housing and student accommodation can be counted towards the housing land supply, it does not mention Gypsy and Traveller pitches.

9. Delivery from the Loddon Valley Garden Village Strategic Development Location ('SDL') was discussed extensively in the hearings. We consider that it is unduly optimistic to assume that dwellings will be delivered on this site in 2027/28. Accordingly, the delivery assumptions for this site should be pushed back by 1 year so that the first 25 completions are assumed in 2028/29.
10. In respect of Policy SS14, the table therein should be updated so that it accurately reflects what is permitted or is subject to a resolution to grant permission. The following should also be reflected in main modifications:
 - SS14.3: The landowner has confirmed that the site is neither available nor deliverable for Gypsy and Traveller pitches. We reach the same conclusion and therefore the allocation should be deleted.
 - SS14.9 and SS14.10: Deliverability of these sites has not been demonstrated in the first 5 years from the anticipated adoption of the Plan. They may form part of the developable supply from 2031/32.
 - SS14.21: Outline planning permission has been granted for up to 234 dwellings in this location, and Policy SS14 should reflect that figure. No substantive reasons have been provided which indicate that development will not come forward in line with that permission.
 - SS14.23: This site is no longer available following a change of ownership, with a business now operating from the site. Consequently, the allocation should be deleted.
11. Additionally, the delivery rates for the following allocations are not justified and should be pushed back:
 - Delivery to begin 2028/29: SS14.4; SS14.8; SS14.14; SS14.20; and SS14.31.
 - Delivery to begin 2029/30: SS14.6 (in relation to the 56 units granted outline permission in October 2025); and SS14.28.
12. To reflect these changes, an updated housing trajectory should be prepared to replace the one in Appendix F, as a main modification to the Plan. The supporting evidence should also be updated and made available at the time of the main modifications consultation (see paragraph 15 below), as an update to document WBC27. Notwithstanding the above, and for reasons we will detail in our final report on the examination, we are satisfied that it is not necessary to

allocate any further sites for housing in the Plan for it to be sound.

Other Main Modifications

13. The main modifications set out for the below policies are also necessary for the Plan to be sound and legally compliant. However, further detailed changes beyond those specified in this letter are also necessary in respect of the precise wording of these and several other policies. We will pass these to the Council via the Programme Officer in due course as part of our comments on a consolidated draft of potential main modifications that the Council shall prepare (see paragraph 14 below).

- **Policy SS3:** This policy is unsound and should be deleted from the Plan. Part 2 of the policy effectively seeks to modify the application of national policy in circumstances where a 5 year supply of deliverable housing sites cannot be demonstrated. This is inconsistent with national policy and is not justified.
- **Policy SS4:** This policy is unsound and should be deleted from the Plan. Parts 2 and 3 of the policy effectively seek to modify the application of national policy in circumstances where a 5 year supply of deliverable housing sites cannot be demonstrated. This is inconsistent with national policy and is not justified. Based on the evidence before us and the discussion at the hearings, the implied cap of 9 dwellings in Part 1 of the policy is also not justified. However, Part 2(b) of this policy should be modified and added to the list of exceptions in Part 2 of Policy SS5.
- **Policy SS8:** In order to be effective, the policy should specify an employment requirement. We are satisfied that there is justification for adopting the figures at paragraph 27 of the Council's Stage 2, Matter 2 hearing statement as a minimum requirement. However, the evidence, including the Council's Employment Land Needs Review [ED2], indicates that opportunities should also be taken that enable higher levels of industrial employment growth¹ to be delivered. Accordingly, in order to be positively prepared and effective, modifications are needed to acknowledge this in the Plan.
- **Policies SS11-SS13:** The requirement for each SDL to provide custom build housing onsite is unsound, as it is not justified by the latest evidence of need. This indicates that there is a significantly lower level of need than was originally anticipated, which is capable of being met by

¹ Expressed as an 'aspirational need' figure of 53 hectares in ED2

windfalls. Accordingly, this requirement should be deleted from Policies SS11-SS13.

A 'concept plan' is located within the supporting text to Policies SS11-SS13. There is currently no reference to these concept plans in the respective policies and their exact status is unclear. Modifications are therefore necessary to paragraphs 5.102, 5.108, and 5.114 to clarify that whilst the concept plans broadly indicate how the principles set out in the policy should be applied, they are indicative only. Reference to the Policies Map being updated in the future should also be deleted.

- **Policy SS13:** The requirement at Part 2(c) that land be reserved to enable the expansion of a proposed secondary school to be 12-form entry is not justified and is therefore unsound. The Loddon Valley Garden Village SDL will not generate a need for a secondary school of this size, and insufficient evidence has been presented to indicate that a need for a 12-form entry school will arise in the future. Accordingly, this requirement should be deleted from the policy.

In addition, it is not justified to identify settlement boundaries within the SDL based on the concept plan for the site, as this was produced before more detailed proposals had been drawn up. It is therefore unlikely to reflect the precise boundaries where development will take place. Instead, the entire site should be allocated without internal settlement boundaries and the policy should state that the agreed Strategic Design Code will identify the areas to be developed based on the place shaping principles listed in Part 3 of the policy. There will be an opportunity to identify settlement boundaries in the next local plan based on the agreed Strategic Design Code. To be clear, this concern does not apply to either the Arborfield Green or South Wokingham SDLs, as the boundaries of those sites are largely defined by existing geographical features.

- **Policy CE2:** Several modifications are required to this policy for it to be sound. In this regard, Exceptional Basis Clause 1 would impose offsetting requirements that would be likely to prevent energy intensive uses from coming forward, and modifications are necessary to remedy this. In order to be consistent with national policy, Exceptional Basis Clause 3 should also be modified so that it also applies to both brownfield and greenfield development. In addition, Part 3 of the policy should be deleted as this requirement would not be effective, and there would be no available sanction or clear action for any exceedance.

- **Policy CE3:** This policy is unsound and should be modified. Exceptional Basis Clause 3 should apply to all types of development, not just previously developed land, in order to be consistent with national policy. Additionally, Part 3 of the policy should also be deleted as this requirement would not be effective, and there would be no available sanction or clear consequence for any exceedance.
- **Policy CE4:** This policy is unsound and should be deleted. It is not clear how the policy would be used for development management purposes or how any non-compliance with the policy would be assessed or measured. The policy is therefore neither effective nor justified. However, a new paragraph may be added to Policy CE5 to encourage the recovery and re-use of deconstructed material where demolition is proposed.
- **Policy CE5:** Part 3 of the policy is unsound and should be deleted. This seeks to restrict demolition unless certain, narrowly defined, criteria apply. However, demolition of existing buildings is permitted development in most cases. The policy could therefore inadvertently incentivise the demolition of existing buildings (using permitted development rights) in the hope of securing planning permission for an alternative building/use. Whilst we acknowledge that a similar policy has been found sound elsewhere, the local circumstances that supported that approach are not before us. Moreover, insufficient local evidence has been presented to justify such an approach in Wokingham. In addition, such a policy would also be likely to inhibit windfall delivery and so would undermine the Council's windfall assumptions.
- **Policy ER2:** This policy is unsound and requires modification. The evidence does not indicate that Core Employment Areas ('CEAs') are being undermined by employment development outside CEAs. While the Council's promotion of major employment development in CEAs is justified, Part 2 is overly negative and inflexible in mandating that a proposal 'must demonstrate' that its criteria are met, particularly in respect of a sequential approach given our position on Policy SS8. The opening of Part 2 should be modified so that development will be 'supported where' its criteria are satisfied, and Part 2(a) should omit specific reference to compliance with a sequential approach.
- **Policy H1:** Part 6 of the Policy is unsound and should be deleted. Insufficient evidence has been presented that this requirement is justified for all forms of older persons housing, which are highly varied in nature.

- **Policy H3:** A number of modifications are required to this policy in order for it to be sound. The current 5 dwelling threshold for affordable housing is inconsistent with national policy and we are not persuaded that local circumstances justify a departure from this. The policy should therefore reflect the national threshold of 10 dwellings. In addition, paragraph 9.31 should be modified to remove reference to Gypsy and Traveller accommodation and care homes as this is not justified by the evidence.

In addition, Part 2 of the policy should be modified so that it removes reference to “exceptional circumstances” and “compelling reasons” as these tests are inconsistent with national policy and are not supported by the submitted evidence.

- **Policy HC4:** This policy is unsound and requires modification. The table at Part 4 of the policy takes forward standards from the 2012 suite of Open Space, Sport and Recreation Study documents [IN3a-c]. Later documents provide updates on quantitative and qualitative matters, but do not give clear reasons for adopting or adjusting those standards for Policy HC4. We therefore find that the underpinning evidence is dated and does not justify strict application of the standards. However, there is no evidence that alternate standards, including those advanced by objectors, would better reflect the borough’s needs, which will vary depending on the facilities near an application site. Accordingly, Part 4 should be modified. Instead, the standards may be expressed as a flexible starting point which enables different provision levels to be accepted where this is supported by evidence.
- **Appendix K – LGS029 (Land South of River Thames):** The spatial extent of this Local Green Space is unsound and requires modification. The area to the west of the Wokingham Waterside Centre is tenuously connected to the rest of the proposed space by land without public access. It includes enclosed private land used for watersports storage and otherwise presents as a narrow band of overgrown and uneven land of limited value in its own right. The evidence does not indicate that it is demonstrably special to a local community and holds a particular local significance. It conflicts with national policy and a modification is needed to remove it from the designation.

14. The Council should now prepare a consolidated draft of all the potential main modifications identified during the hearing sessions and set out in this letter. The Council should also consider if any consequential changes might be required in connection with the potential main modifications specified.

15. At this stage, the draft main modifications should take the form of track changes to the submitted version of the Plan, in Word format. A separate track changes document should be provided for each chapter of the Plan. These should be submitted to us via the Programme Officer. We will then provide comments and work to produce a final version.
16. Once finalised, the main modifications will need to be presented in a schedule and be subject to public consultation. For information, we would also like to see a finalised separate schedule of additional modifications, which do not go to soundness of the Plan, that the Council is proposing.
17. The views we have expressed in the hearing sessions and in this letter on potential main modifications and related Policies Map changes are based on the evidence before us, including the discussion that took place in the hearings. However, our final conclusions on soundness and legal compliance will be provided in the report which we will produce after the consultation on the potential main modifications has been completed. In reaching our conclusions, we will take into account any representations made in response to the consultation. Consequently, the views we expressed during the hearings and in this letter about soundness and the potential main modifications which may be necessary to achieve a sound plan could alter following consultation. Our final report will also explain why other key aspects of the Plan for which we are not recommending a main modification are sound.
18. Please contact us, via the Programme Officer, if you have any queries but, at this stage we are not inviting, nor do we envisage accepting, any comments from other participants in the examination.

Yours sincerely,

Thomas Hatfield and Mark Philpott

INSPECTORS

Table 1: Housing land supply position 31st March 2026 – Updated to reflected corrected housing trajectory

	Updated Housing Trajectory	Removal of LVGV	Removal of SW Extension	Removal of LVGV and SW Extension
Housing requirement 1 April 2023 to 31 March 2026	2,291	2,291	2,291	2,291
Completions and projected completions 1 April 2023 to 31 March 2026	2,131	2,131	2,131	2,131
Over/under supply 1 April 2023 to 31 March 2026	-160	-160	-160	-160
Housing requirement for period 1 April 2026 to 31 March 2031	3,740	3,740	3,740	3,740
Overall housing requirement accounting for over supply / under supply	3,900	3,900	3,900	3,900
Overall housing requirement expressed as an annual requirement	780	780	780	780
Deliverable supply for period 1 st April 2026 – 31 st March 2031	5,776	5,251	5,696	5,171
Deliverable supply in years	7.4	6.7	7.3	6.6

Table 2: Housing land supply position 31st March 2026, plus application of 20% buffer in accordance with NPPF (2024) para. 78

	Updated Housing Trajectory	Removal of LVGV	Removal of SW Extension	Removal of LVGV and SW Extension
Housing requirement 1 April 2023 to 31 March 2026	2,291	2,291	2,291	2,291
Completions and projected completions 1 April 2023 to 31 March 2026	2,131	2,131	2,131	2,131
Over/under supply 1 April 2023 to 31 March 2026	-160	-160	-160	-160
Housing requirement for period 1 April 2026 to 31 March 2031	3,740	3,740	3,740	3,740
Overall housing requirement accounting for over supply / under supply	3,900	3,900	3,900	3,900
Overall housing requirement expressed as an annual requirement	780	780	780	780
Overall housing requirement plus 20% buffer	936	936	936	936
Deliverable supply for period 1 st April 2026 – 31 st March 2031	5,776	5,251	5,696	5,171
Deliverable supply in years	6.2	5.6	6.1	5.5

Explanation of differences between WBC25 and WBC27

1. The Five Year Housing Land Supply Statement at 31 March 2025 (WBC25) assesses the deliverable housing land supply based on information available at the March 2025 base date. It does not take into account the future adoption of the Local Plan Update.
2. The Housing Trajectory (WBC27) sets out the anticipated timing of housing delivery over the plan period 2023-2040. It was prepared in August 2025 and takes into account the future adoption of the Local Plan Update.
3. The different timing and purpose means that WBC27 takes into account information and delivery from sites not identified in WBC25. This includes information post 31st March 2025 which demonstrates there is a realistic prospect of housing being delivered within five years of adoption of the plan:
 - Sites proposed for allocation in the LPU, identified in Policies SS11, SS12 and SS13, and SS14;
 - Large sites granted planning permission post 31st March 2025; and
 - Development parcels on adopted SDLs where Reserved Matters applications have been submitted or determined.
4. As requested at the Matter 5 discussion, a full comparison between WBC25 and WBC27 has been undertaken. The following corrections have been made within the updated WBC27:
 - South Wokingham SDL delivery – Parcels R10 and R11: As discussed during the hearings, delivery from parcels R10 and R11 has been moved back one year to occur from 2026/27, reflecting the correct years consistent with WBC25. This reduces completions in 2025/26 to 0 and increases completions in 2029/30.
 - The site at 43,43b,43c,45 and 47 Peach Street, Wokingham was duplicated in the Housing Trajectory. The duplicate site entry for 24 dwellings has been deleted.
 - Delivery from small sites has been updated to correct an error when transposing data into the housing trajectory. This increases completions in 2025/26 by 5 dwellings, and in 2026/27 by 6 dwellings.
5. All other aspects of the Housing Trajectory are unchanged. The implications of the above corrections on the projected housing delivery are set out below:

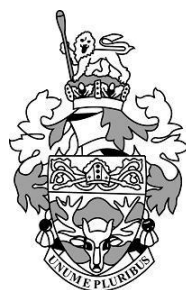
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Total
Housing Trajectory (WBC27)	747	765	1,596	1,259	1,191	868	6,426
Corrected Housing trajectory	635	719	1,562	1,315	1,312	868	6,411

Wokingham Borough Local Plan Update 2023-2040

Response to Matter 5: Housing Land Supply

Wokingham Borough Council's Statement Part 2 Hearing Sessions

3 March 2026



**WOKINGHAM
BOROUGH COUNCIL**

1. This statement sets out Wokingham Borough Council's (WBC's) response to the Part 2 hearing session on Matter 5 Housing Land Supply. The questions are shown in bold within a border. WBC's responses are shown below each question.

1) Are proposed modifications MM3, MM4 and MM24 to tables 2 and 6 of the Plan needed to clarify anticipated housing delivery from small sites with planning permission and windfall sites and update the base housing land supply?

2. WBC included a Schedule of proposed modifications (2025) ([CD22](#)) when submitting the Plan for examination.
3. Modifications MM3, MM4 and MM24 related to the housing land supply and were proposed in response to representations received in response to publication of the plan under Regulation 19. Their intention was to add clarity by disaggregating delivery of housing from sites with planning permission for 9 dwellings or fewer from sites for 9 dwellings or fewer that can be anticipated (small sites windfall).
4. After preparing the Schedule of proposed modifications (2025) ([CD22](#)), WBC prepared and submitted an updated housing trajectory (August 2025) ([WBC27](#)), reflecting the movement into a new monitoring year. As a result, modifications MM3, MM4 and MM24 no longer reflect the most recent evidence and require updating.
5. Whilst the necessary modifications are primarily factual, WBC acknowledge that the windfall aspects refer to anticipated housing supply and therefore considers them to be main modifications, which are necessary to ensure the soundness of the plan.
6. The following replacement modifications are proposed to reflect the most recent housing trajectory (August 2025) ([WBC27](#)).
7. Please note that within the replacement modifications below, WBC has corrected a coding error for sites within the Arborfield Green SDL, where 9 parcels were categorised as 'Other' when they had been granted outline planning permission. The sites should have been categorised as 'Permission'. There are no implications for the land supply enabled by the plan, with the correction simply moving supply of 725 dwellings from one 'pot' into another.

Plan page 36, Table 2 (replaces MM3 and MM4)

Table 2: Base housing land supply **at 31 March 2025.**

	Number of dwellings
Completions (2023/24-2024/25)	<u>1,496</u>
Sites with planning permission for 10 or more dwellings	~~5,885~~ <u>5,876</u>
Sites with resolution to grant planning permission for 10 or more dwellings	~~359~~ <u>191</u>
Sites with planning permission for 9 or fewer dwellings ~~and sites which can be anticipated (windfall)~~	~~1,880~~ <u>183</u>
<u>Sites for 10 or more dwellings which can be anticipated (large site windfall)</u>	<u>480</u>
<u>Sites for 9 or fewer dwellings which can be anticipated (small site windfall)</u>	<u>1,040</u>
Wokingham town centre broad area	~~200~~ <u>140</u>
TOTAL	~~8,374~~ <u>9,460</u>

Plan paragraph 5.90, Table 6 (replacement MM24)

Table 6: Housing land supply **at 31 March 2025.**

Source	Number of dwellings
Completions (2023/24-2024/25)	1,496
Sites with permission for 10 or more dwellings	5,885 5,876
Sites with resolution to grant permission for 10 or more dwellings	359 191
Sites with planning permission for 9 or fewer dwellings ~~and sites which can be anticipated (windfall)~~	1,880 183
Sites for 10 or more dwellings which can be anticipated (large site windfall)	480
Sites for 9 or fewer dwellings which can be anticipated (small site windfall)	1,040
Wokingham town centre broad area	200 140
Arborfield Green SDL allocation (Policy SS11) (Excluding sites with permission and resolution to grant permission)	910
South Wokingham SDL allocation (Policy SS12) (Excluding sites with permission and resolution to grant permission)	980
Loddon Valley Garden Village SDL allocation (Policy SS13)	2,700
Other allocations (Policy SS14) (excluding sites with permission and resolution to grant permission)	1,081 945

2) Will there be at least a 5 year supply of deliverable housing land on adoption of the Plan?

8. The evidence base regarding this issue includes:
 - Housing Trajectory August 2024 ([WBC27](#)).
 - Written Statements: WBC response to Matter 4, Issue 2, Question 4: Housing Requirement and Supply ([WS4/1](#)).
9. The housing trajectory ([WBC27](#)) provides a comprehensive schedule of completions and projected completions for the full plan period. The trajectory demonstrates a deliverable housing land supply in excess of five years upon adoption of the plan. That remains the case, even if no contribution is included from Loddon Valley Garden Village or the South Wokingham SDL Extension, as explained fully in WBC response to the Part 1 hearing Matter 4, Issue 2, Question 4 ([WS4/1](#)).
10. Table 1 below shows the calculation of the deliverable housing land supply based on the housing trajectory ([WBC27](#)), as well as scenarios where no contribution is included from Loddon Valley Garden Village and South Wokingham SDL Extension. This information reflects WBC's response to the Part 1 hearing session Matter 4, Issue 2, Question 4 ([WS4/1](#)). The lowest deliverable land supply is 6.7 years, applying the methodology required by the NPPF (2023).
11. The housing trajectory ([WBC 27](#)) demonstrates that the vast majority of projected completions in the five year period will be on land which benefits from detailed planning permission. These will be supplemented by additional sites being granted planning permission by the point of adoption.
12. For completeness, it can be noted that paragraph 78c) of the NPPF (2024) would expect a 20% buffer to be applied for decision-making purposes when calculating the deliverable housing land supply from 1 July 2026 following the adoption of the plan in the context of Wokingham Borough. However, even when this buffer is applied, the housing trajectory demonstrates a supply in excess of five years (with or without the completions that are projected from Loddon Valley Garden Village (LVGV) and the South Wokingham SDL Extension).

Table 1: Housing land supply position 31 March 2026

	Housing Trajectory (WBC 27)	Removal of LVGV ¹	Removal of SW Extension ²	Removal of LVGV & SW Extension ³
Housing requirement 1 April 2023 to 31 March 2026	2,291	2,291	2,291	2,291
Completions and projected completions 1 April 2023 to 31 March 2026	2,243	2,243	2,243	2,243
Over/under supply 1 April 2023 to 31 March 2026	-48	-48	-48	-48
Housing requirement for period 1 April 2026 to 31 March 2031	3,740	3,740	3,740	3,740
Overall housing requirement accounting for over supply / under supply	3,788	3,788	3,788	3,788
Overall housing requirement expressed as an annual requirement	757.6	757.6	757.6	757.6
Deliverable supply for period 1 April 2026 to 31 March 2031	5,679	5,154	5,599	5,074
Deliverable supply in years	7.5	6.8	7.4	6.7

¹ 525 dwellings removed from the five year period.

² 80 dwellings removed from the five year period.

³ 605 dwellings removed from the five year period.

3) Does the Plan identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, as set out in paragraph 70(a) of the Framework?

13. The evidence base regarding this issue includes:

- Topic Paper: Housing: Site allocations ([HO14](#)).
- WBC's Response to the Inspectors' Initial Questions ([WBC6](#)).
- Housing and Economic Land Availability Assessment (HELAA) (September 2024) ([HO7a](#) and [HO7b](#)).
- Updated Table 18 Windfall Completions in WBC6 ([WBC 6A](#)).

14. NPPF (2023) paragraph 70 recognises that small and medium sites can make an important contribution to meeting the housing requirements of an area. To promote a good mix of sites 70(a) states that local authorities should:

“identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;”

15. Through Policy SS14, the plan allocates a number of sites that are no larger than 1ha.⁴ However, WBC accepts that this does not meet the 10% target advanced in the NPPF 2023.
16. There are strong reasons that justify the plan not meeting the 10% target, relating to the nature of the housing land supply enabled by the plan and the characteristics of promoted available land for housing. Although the plan does not meet the 10% target through identified sites, on the basis of windfall developments, sites no larger than 1ha will exceed the 10% target.
17. Details of all land promoted for development is set out in the Housing and Economic Land Availability Assessment (HELAA) ([HO7a](#) and [HO7b](#)). Notwithstanding several call for sites and opportunities to promote land in response to consultations, few small sites were promoted by landowners/developers as being available for housing development.
18. Sites assessed as deliverable, developable and potentially developable for housing are set out in Tables 8-10 of the HELAA. Almost all of the sites no larger than 1ha have been included in the plan's housing land supply as a result of having planning permission, a

⁴ SS14.1 (High Barn Farm, Commonfield Lane), SS14.8 (Hillside, Lower Wokingham Road), SS14.9 (39-53 New Road), SS14.10 (Land to the rear of Northbury Lane), SS14.13 (Rustlings, The Spring and land to the rear of Cushendale, Shinfield Road), SS14.15 (Lans off Wheatsheaf Close), SS14.24 (Woodside, Blagrove Lane), SS14.25 (Rosery Cottage and 171 Evendons Road), SS14.26 (Bridge Retail Park, Finchampstead Road), SS14.27 (Land south of London Road), SS14.29 (Station Industrial Estate, Oxford Road), SS14.31 (Lans at the north corner of Wellington Road and Station Road).

resolution to grant permission, or an allocation under Policy SS14 or as part of a wider Strategic Development Location. Where a site has not been included, clear reasons are given within Table 2 of the Housing Site Allocations Topic Paper ([HO14](#)).⁵

19. Small sites (those delivering 9 or fewer dwellings) are likely to be no larger than 1ha. An annual average of 79.7 dwellings is completed on small sites in Wokingham Borough each year.⁶ Over the 17-year plan, this amounts to 1,355 dwellings or 10.6% of the housing requirement.
20. The housing trajectory shows delivery from small sites. At the time of preparation, completions, projected completions from sites with permission, and an allowance for windfall amounted to 1,333 dwellings over the plan period, again exceeding the 10% of the housing requirement.
21. Given that some sites delivering 10 dwelling or more will also be no larger than 1ha, the above figures should be viewed as a minimum, with a realistic prospect of being exceeded.
22. In summary, evidence on housing land supply shows that insufficient available, deliverable or developable land was available for the Plan to meet the 10% target set out in NPPF (2023) paragraph 70. Notwithstanding, the housing land supply enabled by the plan supports delivery of housing from sites no more than 1ha so that no additional small sites are required.

⁵ Silverstock Manor, Finchampstead (5FI005); and Suffolk Lodge, Wokingham (5WK048), which are under 1ha, were both assessed after the HELAA as being unavailable for the development.

⁶ Please see WBC's response to Inspectors' request, for updated Table 18 of WBC's response to the Inspectors' Initial Questions (WBC 6) ([WBC 6A](#)).