
**ANNEX 2 TO PLANNING APPEAL PROOF
OF EVIDENCE: LOCAL PLAN UPDATE
ROLE IN BOOSTING 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



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1.0 Introduction

Overview

- 1.1. This Annex on the 'Role of the Local Plan Update in boosting 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 (CD06.12) is no more than 2.5 years (a deficit of some 3,461 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. This covered in further detail in Annex 1 which explores the adequacy of Housing Land Supply when assessed under the targets and approach of the current NPPF (December 2024).
- 1.6. This annex explores the role of the Local Plan Update in boosting the supply of housing in the Borough and what the position might be once the Local Plan is adopted. This is relevant to the issues under consideration in this Appeal, and it is clear that there simply is no certainty on when the LPU will be adopted and whether the necessary six-year supply of housing sites will be maintained at that point in time (noting the need for a 20% buffer as per NPPF paragraph 78(c)).
- 1.7. Although the Council suggests, as indicated in the trajectory submitted to the Local Plan Examination (CD07.33), that once adopted the Local Plan Update would enable the maintenance of a five year supply, this is disputed by the Appellant.
- 1.8. The Appellant disputes the ability of the Local Plan Update to address the housing land supply shortfall to the extent expected by the Council. This is because of the following factors:
 - a) The timetable for the remaining stages of the Examination remains uncertain and consequently the timing for the eventual adoption of the Plan (should this be recommended by the Inspector);
 - b) The Inspector examining the Plan has not determined whether the policies and site allocations in the submitted Local Plan are sound or can only be made such with significant revisions (including omission of existing allocations and/or the identification of additional ones).
 - c) The timeframe for delivery of the allocations is not justified.
- 1.9. Taking account of these factors, the Appellant disputes the role of the Local Plan Update to ensure the minimum five-year supply of housing.

2.0 Local Plan Update Role in Boosting Housing Supply

Overview

- 2.1. The Council in September 2024 agreed their most recent project plan for the preparation of Planning Policy documents in the borough, which is primarily the Local Plan Update. This is within the Local Development Scheme (LDS) which provides the three year project plan from 2024 through to 2027. Table 1 of the Local Development Scheme (repeated below as Table A) details the then expected timetable for preparation and eventual adoption of the Local Plan.

Table A: Programme for the preparation of the Local Plan Update (Table 1 of LDS)

Stage	Date anticipated	Date completed
Issues and options consultation	August 2016	
Spatial options consultation	November 2018	
Draft Plan consultation	February 2020	
Revised Growth Strategy consultation	November 2021	
Proposed Submission Plan Publication	September 2024	30 th September to 13 November 2024
Submission	December 2024 – January 2025	28 th February 2025
Examination hearings (stage 1)	April 2025	November 2025
Examination hearings (stage 2)	September 2025	17 th March – 26 th June 2026
Inspector's post hearing letter	November 2025	? Unknown
Modifications consultation	January 2026	? Unknown
Inspectors report of examination	April 2026	? Unknown
Adoption	May 2026	? Unknown

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- 2.2. As recognised by the Council, the achievement of the expected timeline from submission of the Plan was indicative and was based upon submission for examination occurring in December 2024. For each month's delay, there should be corresponding adjustments for the subsequent steps.
- 2.3. Consultation on the Proposed Submission Plan took place from 30th September to 13 November 2024, inline with the timeline envisaged in the LDS. The Local Plan Update was submitted for examination on 28th February 2025. As this was three months later than the earliest December 2024 date advanced in the LDS, subsequent stages in the examination should be adjusted accordingly. This would mean the hearings would have been expected to occur in late June/early July 2025 with the Inspector's Report anticipated in late June/early July 2026 with adoption shortly thereafter.
- 2.4. However the first stage of hearings did not take place until November 2025 which is a delay of a further 5 months. Whilst the Inspector's in their letter of 17th December 2025 have indicated that the Examination can continue with a further round of hearings to be arranged, the subject matter and timetable for this is yet to be arranged. Furthermore, the Inspectors have asked for refinements to be published on transport modelling data, covering an expanded area including Bracknell and Reading urban areas. As of 5 February 2026, this refined transport modelling has yet to be issued, despite the Council having indicated (as recorded in the Inspector's Post Stage 1 Letter, paragraph 5) "that producing this work would be straightforward and that it could be completed relatively quickly".(CD07.52)
- 2.5. On 2 February 2026 the Inspector wrote to set out the Matters, Issues and Questions ('MIQs') for the part 2 hearing sessions. (CD07.51) In total the Inspector identifies 30 questions to be examined in respect of Matter 1: Spatial Strategy, 15 in respect of Matter 2: Employment Land and Gypsy and Traveller Needs and Requirements, 10 in respect of Matter 3: Policies Relating to the SDLs, 8 in respect of Matter 4: Site Allocations, 3 in respect of Matter 5: Housing Land Supply, 5 in respect of Matter 6: Infrastructure, 8 questions in respect of Matter 7: Flooding and Drainage Policies, 31 questions in respect of Matter 8: Climate Change and Energy Policies, a further 31 questions in respect of Matter 9: Housing Policies, 10 questions in respect of Matter 10: Design,

Heritage and the Built Environment Policies, 26 questions in respect of Matter 11: Healthy and Safe Communities Policies, 21 questions in respect of Matter 12: Natural Environment Policies, 18 questions in respect of Matter 13: Economy, Employment and Retail Policies, 19 questions in respect of Matter 14: Connections Policies and finally, 6 questions in respect of Matter 15: Viability and Monitoring. Clearly there is quite some way to go before it can be said that the plan is at an 'advanced stage' or close to being found to be sound.

- 2.6. Until such time as those Stage 2 hearing have been conducted and concluded (June 2026 – as per Hearing Sessions Programme at CD07.50), and pending the Inspector's publication of interim conclusions (including clarification on the need for any formal modifications) or their final conclusions, it is not considered realistic to expect adoption of the Plan until at least December 2026 and potentially up to February 2027 based on timescales elsewhere. The Appellant has reached this conclusion having regard to the following.
- 2.7. The Government publishes data on the progress of examining Local Plans¹ which indicates that for the 73 plans submitted for examination since 25th January 2019 and found sound on or before 8th January 2026, there was on average 870 days (over 2 years and 4 months) between publication and the document being found sound. This also shows an average of 639 days (over 21 months) between submission for examination and the document being found sound. Since adoption cannot occur until after the Plan has been found sound, this will therefore occur later.
- 2.8. Whilst the Government anticipates accelerated examinations of Local Plans as part of the wider 30-month timeline for their preparation, this applies to documents to be prepared under the auspices of the Levelling Up and Regeneration Act 2024 which applies to those submitted after 31st December 2026. Wokingham's Local Plan Update is being examined under the previous December 2023 NPPF.
- 2.9. Therefore, applying the evidence associated with the examination of other strategic Local Plans indicates the following. Allowing the average 2 years and

¹ <https://www.gov.uk/government/publications/local-plan-monitoring-progress>

4 months from consultation on the Draft Local Plan Update would imply that receipt of the Inspectors Report could be anticipated in February 2027. Alternatively, applying the average of 21 months from the submission date of 28 February 2025 means that on this scenario, the Inspectors Report could be expected in November 2026.

- 2.10. As indicated above, based upon the timescales of the examinations of other Strategic Local Plans, the earliest realistic adoption for the Local Plan Update is December 2026 and a date up to February 2027 may in fact be more realistic. The LPU's role in boosting supply is limited until then.
- 2.11. This limited role is especially important for those sites which rely upon the approach of the Submitted Local Plan to reinforce their acceptability, especially on matters such as compliance with the Sequential Test. This is because NPPF paragraph 180 only applies to allocated sites in an adopted Local Plan.
- 2.12. This s78 appeal will be determined before conclusion of the Stage 2 hearings in June 2026. The Start Letter notes the decision will be issued on or before 6 May 2026. As such, there will be no clarity on the Inspector's findings in terms of soundness of the LPU, nor the need for Main Modifications at the point of decision. In the context of this appeal the parties cannot prejudge how successful the LPA will be in defending their LPU and proposed spatial strategy and the serious question of deliverability of the proposed allocations/ housing trajectory. There is no certainty, and nor will there be at the point of decision on this appeal, that the Examining Inspector will resolve in favour of the LPA.
- 2.13. The submitted Local Plan² requires the delivery of 12,763 dwellings from April 2023 to March 2040, which equates to an average of 751 dwellings annually.
- 2.14. Annex 1 Housing Land Supply Statement associated with the Planning Proof of Evidence indicates that taking account of the most recently published inputs in the calculation of Local Housing Need³, the Borough requires a minimum of 1,371 dwellings annually.

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- 2.15. As identified above the Local Plan Update is being examined pursuant to the December 2023 NPPF, having been submitted for examination in accordance with the transitional provisions introduced with the December 2024 NPPF.
- 2.16. Pursuant to criterion c of NPPF⁴ paragraph 78, a 20% buffer applies to housing land supply calculations where the annual requirements over the plan period is less than 80% of the latest Local Housing Need figure. Such a buffer would apply from 1st July 2026. This provision is aimed at situations such as this, where a LPA has proceeded with examination of a Local Plan Update which delivers housing at a rate significantly lower than that which is now required.
- 2.17. The current Local Housing Need calculated consistent with the NPPF (December 2024) is 1,317dpa. We note updates to the inputs are scheduled before 1st July 2026⁵. Pending the release of the updated inputs, the current 80% threshold for imposing the 20% buffer is 1,053.
- 2.18. The 20% buffer will apply from 1 July 2026. The submitted Plan currently requires an average of 751 dwellings annually. By contrast, the Local Housing Need figure would now be 1,053dpa (subject to any refinement of the inputs). The Local Plan Update's requirement is only 71% of current housing need.
- 2.19. On that basis, the LPU, even if adopted in December 2026 – February 2027, will require immediate review.