PERMISSION IN PRINCIPLE APPLICATION

Land Adjacent to Carlisle Lodge, Forest Road

Wokingham, Berkshire RG40 5SA



The Site (edged red), the eastern garden land of Carlisle Lodge, south of Forest Road (B3034). Image © 2026 Airbus.

PROPOSAL

One new self-build dwelling on garden land (east)

PREPARED ON BEHALF OF THE APPLICANT BY

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SITE AT A GLANCE

Application type
Permission in Principle - Town and Country Planning (Permission in Principle) Order 2017 (as amended)

Use and quantum
Residential · one self-build dwelling

Site area
c. 851 m² (0.085 ha / 0.21 acres)

Land status
Previously developed land (NPPF Annex B) - consented residential curtilage

Designations
Outside Green Belt and Conservation Area; no listed buildings or TPOs affected

Thames Basin Heaths SPA
Within 7 km zone, outside 5 km zone - no SANG required; SAMM offered

Primary policy basis
NPPF Policy S5(1)(d) - redevelopment of previously developed land

Secondary policy basis
NPPF Policy S5(1)(j) - unmet need; 2.5-year housing land supply

01 Introduction

1.1 This Planning Statement has been prepared in support of an application for Permission in Principle (**PiP**) for the erection of one new dwelling on garden land to the east of Carlisle Lodge, Forest Road, Wokingham, RG40 5SA (the **Site**). The application is submitted pursuant to the Town and Country Planning (Permission in Principle) Order 2017 (as amended).

1.2 Permission in Principle is the appropriate vehicle for this application. The procedure is designed to establish whether the principle of residential development is acceptable in policy terms without requiring the submission of detailed design or technical information. Those matters will be addressed at the Technical Details Consent (**TDC**) stage, if this PiP is granted.

1.3 The proposed development is for a single self-build dwelling. The application is made by Mr Bilbil Shehu, the freehold owner of the Site and of Carlisle Lodge, on behalf of his son, Mr Zaim Shehi, who will build the dwelling and occupy it as his principal residence. A Unilateral Undertaking securing the self-build status of the proposal, executed by Mr Bilbil Shehu as freehold owner with Mr Zaim Shehi joining, has been submitted with this application.

The self-build nature of the application is a material consideration of significant weight in the planning balance, as set out in this Statement.

1.4 The Site is located in the countryside outside any defined settlement boundary. However, as this Statement demonstrates, the proposal engages the positive provisions of Policy S5 of the new National Planning Policy Framework (August 2026) (the **NPPF**) by virtue of:

(a) the Site constituting previously developed land under Policy S5(1)(d); and

(b) the Council's housing land supply of 2.5 years representing a substantial unmet need that engages Policy S5(1)(j).

1.5 The proposal is therefore expressly supported by national policies that now support specific types of development outside settlements. As explored in this Statement, those NPPF policies direct that the principle of development should be approved unless the proposal's adverse effects would *substantially* outweigh its benefits. This balance is assessed in detail, concluding in favour of the development.

02 Site Description and Context

2.1 Carlisle Lodge is situated on the southern side of Forest Road (B3034), approximately 1 mile to the north of Wokingham town centre and 1,000 m from the edge of Binfield to the east. The property is accessed from Forest Road via a private driveway.

2.2 The application site comprises the eastern portion of the residential curtilage of Carlisle Lodge, which is itself positioned centrally on the plot. The application site is indicated on the submitted Location Plan edged red, with a satellite view (also edged red) reproduced below for reference.



IMAGE 1 Aerial perspective of the Site and its relationship with the group of houses to the north - 25 properties in total, together with a children's nursery and pre-school.

2.3 The Site has no trees subject to Tree Preservation Orders. The Site does not fall within a Conservation Area, is not within the setting of a Listed Building, and is not within the Green Belt. The Site is located within the Countryside designation as defined by the Wokingham Borough Local Plan.

2.4 The Site falls within the Thames Basin Heaths Special Protection Area (**SPA**) 7 km zone of influence but is outside the 5 km zone. Accordingly, no SANG contribution is required. The applicant confirms a willingness to make a SAMM contribution in accordance with Wokingham Borough Council's adopted tariff, to be secured by way of planning obligation at TDC stage if PiP is granted. The SPA does not, therefore, represent a constraint to the principle of development.

03 Proposed Development

3.1 This application seeks Permission in Principle for the erection of one new self-build dwelling on the eastern portion of the residential curtilage of Carlisle Lodge. By the nature of PiP, only the following parameters are established at this stage:

DWELLINGS	SITE AREA
One	c. 851 m²
	0.085 ha / 0.21 acres

3.2 Detailed matters including design, appearance, access, landscaping, drainage and materials are reserved for the TDC stage and are not subject to determination at this time. It should, however, be noted that the Site has its own access from the road, shown below.



IMAGE 2 Access to the Site (right) is achieved via an existing separate gated entrance.

3.3 The dwelling will be designed and constructed as a self-build home for the applicant's son, Mr Zaim Shehi, who will occupy the property as his principal residence. Further details of the self-build nature of the proposal are set out in Section 9 below.

04 Relevant Planning History

4.1 The planning history outlined in this section is relevant to the consideration of this application.

4.2 Planning permission was granted by Wokingham Borough Council in 2019 (ref: 191851) for the demolition of the former dwelling on the site and the erection of a replacement dwelling. That consent was subsequently implemented, and Carlisle Lodge has been constructed as the new dwelling.

4.3 The 2019 decision report characterised the development as being "located in the countryside" for the purposes of Core Strategy Policy CP11. That characterisation informed the basis on which the replacement dwelling consent was assessed, and informs the basis of this application today.

4.4 Importantly, the 2019 permission confirms the lawful and established residential character of the garden curtilage of Carlisle Lodge, and is evidence that the Site is located within an approved residential red line boundary. The curtilage of a permanent structure falls expressly within the definition of Previously Developed Land in Annex B of the NPPF, so the PDL status of the Site is directly justified by the Annex B definition. How this supports the acceptability in principle of the proposed development is set out in greater detail below.

05 National Planning Policy Framework (August 2026)

5.1 Overview and status

5.1.1 The National Planning Policy Framework was comprehensively rewritten and published on 17 August 2026. This is the first full rewrite of the NPPF since its original publication in 2012. The new Framework's decision-making policies are material considerations in the determination of all planning applications from the date of publication.

5.1.2 For development outside settlements, the operative policies are:

S3 the presumption in favour of sustainable development; and

S5 development outside settlements.

5.2 Policy S3 - the presumption in favour of sustainable development

5.2.1 Policy S3 establishes a permanent presumption in favour of sustainable development. Unlike the position under earlier iterations of the NPPF, this presumption is not conditional upon the housing land supply position or Housing Delivery Test performance; it is the default position from which all decision-making flows. For development outside settlements, such as this application, it is applied through the specific provisions of Policy S5.

5.3 Policy S5 - development outside settlements

5.3.1 Policy S5 is the primary operative national policy for this application. For the first time in the history of the NPPF, this policy provides an explicit and positive framework for certain categories of development outside defined settlement boundaries to be approved. Where a proposal falls within one of those specified S5 categories, the NPPF directs it should be permitted *"unless the benefits of doing so would be substantially outweighed by any adverse effects"*.

5.3.2 The principal category of development under Policy S5 that is relevant to this application is the redevelopment of previously developed land (**PDL**) under Policy S5(1)(d). This application engages that category directly, because the garden land that constitutes the application site is PDL under its definition in Annex B of the NPPF, applying the case of *Dartford Borough Council v SSCLG*.[1] This primary argument in favour of the application is covered in substantive detail in section 7 of this Statement. A secondary basis for the application under Policy S5(1)(j), arising from the Council's housing land supply shortfall, is set out in section 8.

5.3.3 The Site is located outside the Green Belt and other landscape designations, and is located among a group of houses from which a pavement runs into the large village of Binfield 1,000 m away, providing local people with a wide range of services and facilities, including schools, shops, a doctor's surgery and wider transport facilities. We will therefore submit that the adverse effects of the proposal can only be limited, and would not *substantially* outweigh its benefits. The weighting of benefit against adverse effects are covered in greater detail in Section 11 of this Statement.

Why the Site is not 'isolated' under the new NPPF

5.3.4 Policy S5(3) directs that "Development proposals comprising isolated homes, which are those lying outside settlements or groups of houses, should not be approved..." but the Site is not 'isolated'. It sits directly opposite a continuous frontage of 25 houses and a nursery, making it functionally and visually influenced by that built-up context - it fundamentally sits among a group of houses. The presence of urbanising infrastructure - such as the continuous pavement extending from the 25 homes opposite into Binfield - also shows the Site is part of a walkable, connected, non-isolated environment. In *Braintree*, the court held that "isolated" carries its ordinary English meaning, being "physically separate or remote from other dwellings."[2] On these facts, the Site cannot rationally be described as "physically separate or remote" from other dwellings, and so cannot be considered 'isolated' in the NPPF context of Policy S5(3).

06 Development Plan Policy

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

6.2 To the extent that any development plan policy operates as a blanket prohibition on residential development in the countryside without giving effect to the categories of acceptable development identified under Policy S5 of the August 2026 NPPF, such a policy is materially inconsistent with current national policy and should be afforded very limited weight in accordance with Annex A of the new Framework.

[1] *Dartford Borough Council v Secretary of State for Communities and Local Government* [2017] EWCA Civ 141

[2] *Braintree District Council v Secretary of State for Communities and Local Government* [2018] EWCA Civ 610

07 Previously Developed Land: The Primary Argument

7.1 Policy framework

7.1.1 The principal argument in support of this application is that the application site constitutes previously developed land (PDL) and that the proposal therefore falls squarely within Policy S5(1)(d) of the August 2026 NPPF.

7.1.2 The definition of previously developed land is set out in Annex B of the NPPF. PDL is defined as land which is or was occupied by a permanent structure, including the curtilage of the developed land. The definition explicitly excludes:

> *"...land in* **built-up areas** *such as residential gardens..."* - NPPF ANNEX B

7.1.3 The critical and determinative qualifier in this exclusion is the phrase "in built-up areas". The exclusion does not extend to all residential garden land; it applies only to residential garden land that forms part of a built-up area. This follows the direction of the courts in *Dartford Borough Council v SSCLG*.[3]

7.2 The Site is not in a built-up area

7.2.1 The application site is demonstrably not in a built-up area. The Site is surrounded on three sides by open agricultural land. To the north lies a classified road, beyond which the residential group of 25 homes is located, as well as Kingsclere Day Nursery - a day nursery and pre-school - opposite the Site.

7.2.2 This is therefore not a marginal case. The 2019 decision report from Wokingham Borough Council itself characterised the Site as "located in the countryside". That characterisation was made under local plan policy rather than the NPPF, and is consistent with a finding that the Site is not in a 'built-up area' for the purposes of the PDL definition.

7.2.3 Accordingly, the garden land that forms the subject of this application falls within the definition of previously developed land.

7.3 Policy consequence

7.3.1 Having established that the application Site constitutes previously developed land, the proposal falls within Policy S5(1)(d) of the August 2026 NPPF. Moreover, while Policy S5(3) states that development proposals comprising "isolated homes" should not be approved, we have shown in section 5.3.4 that this same Policy now specifically defines 'isolated' as developments *outside* settlements or "groups of houses" - as the Site is among a group of houses, with 25 homes located only a few yards to the north, the proposal is not 'isolated' in this policy context. In addition, we have shown that the Site is not 'isolated' under the definitions carried by the *Braintree* decision either.

[3] *Dartford Borough Council v Secretary of State for Communities and Local Government* [2017] EWCA Civ 141

7.3.2 In addition, the proposal makes effective and efficient use of previously developed land. Although Policy L1 of the NPPF is a plan-making policy, it directs that development plans should accommodate as much as possible of the identified need for development on previously developed land, including by allocating sites "of all sizes" (Policy L1(1)(a)(i)). A single self-build dwelling on previously developed land is consistent with that national objective, which is a further benefit to be weighed in the planning balance. The proposal may also be said to make better use of underutilised land, to which Policy L2(1)(b) attaches *"substantial weight"*.

7.3.3 Therefore, the test to be applied under Policy S5 is now simply whether the adverse effects of the development would substantially outweigh its benefits. The benefits of the proposal are set out in Sections 8, 9 and 10 below.

08 Satisfying Unmet Housing Need: The Secondary Argument

8.1 Policy S5(1)(j) of the NPPF states that outside settlements, *"Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites...)"* should be approved unless adverse effects substantially outweigh the benefits.

8.2

2.5 years' housing land supply confirmed by Wokingham Borough - half the five-year requirement

Wokingham Borough has confirmed it can only show 2.5 years' worth of housing land supply - a significant shortfall that explicitly engages Policy S5(1)(j) of the NPPF in this case, provided the Site is physically well-related to an existing settlement.[4]

8.3 We submit that the Site is physically well-related to the settlement of Binfield, the edge of which is located approximately 1,000 m to the east along Forest Road. The cluster of 25 homes opposite the Site is connected to this settlement via a safe pedestrian pavement, making the distance entirely walkable, and the cluster of homes is further anchored socially by the active nursery and pre-school opposite the Site. We submit that the pavement is in place precisely because it was intended that Binfield should be accessible for this group of houses, and it therefore confirms both the sustainability of the Site and its close physical relationship with Binfield.

8.4 Furthermore, as set out in Section 9, there is an unmet need in self-build delivery in the Borough in addition to the five-year supply shortfall.

8.5 Under Policy S5(1)(j), the application contributes to unmet housing needs and should be approved unless its adverse effects substantially outweigh the benefits. It is noteworthy that the Site is located along a Green Route Enhancement Area and in Landscape Character Area 'Ashridge Farmed Clay Lowlands', which is *"a*

[4] As per the conditions of Policy S5(1)(j)(i).

landscape of strong character and moderate quality and condition, with a moderate sensitivity" according to the 2019 report approving neighbouring Carlisle Lodge. As the landscape carries only moderate sensitivity and the Site is seen in the context of (a) Carlisle Lodge next door and (b) the cluster of 25 homes opposite on Forest Road, we submit that the adverse effects of this scheme cannot reasonably "substantially" outweigh the benefits of its contribution to meeting housing shortfalls in the Borough. A full appraisal of the planning balance is set out in Section 11.

09 Self-Build: A Significant Material Consideration

9.1 Legislative and policy framework

9.1.1 The Self-Build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016 and most recently by the Levelling-up and Regeneration Act 2023 (LURA), places a statutory duty on local planning authorities to grant sufficient development permissions to meet the demand evidenced by Part 1 entries on their self-build register within three years of each base period.

9.1.2 This statutory duty is a legal obligation and a material consideration in the determination of planning applications. The weight to be afforded to the self-build case is therefore significant, and Policy HO7 of the NPPF 2026 supports this with the following direction:

> *"...substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence."*

The benefits of this self-build scheme should therefore be given substantial weight, because self-build homes are an evidenced accommodation need in Wokingham Borough, as set out below.

9.2 Wokingham's self-build delivery position

9.2.1 Wokingham Borough Council is required to publish its self-build register data and to demonstrate compliance with its statutory delivery obligations.

9.2.2 The latest details on self-build delivery were published by the Council in April 2026 in the WBC 59 update, submitted to the Inspectors during the Local Plan examination (Appendix 1). WBC 59 presents a revised table which removes 167 individuals from its Part 1 entries across all base periods, reducing the total Part 1 figure from 281 to just 114.

281	−167	114
Part 1 entries before revision	individuals removed in WBC 59	revised Part 1 total

9.2.3 Firstly, it is relevant that an Inspector at an appeal in Lancashire in May 2024 held:

> *"Whilst authorities may remove individual details from the register, the number of entries remains the same, and retrospective removal of an entry* ***does not reduce the demand figure****. Moreover, unmet demand is now cumulative, so any demand that has not been met within the three-year compliance period does not dissipate but rolls over and remains part of the demand that an authority has to meet."*[5]

9.2.4 It is therefore not clear that the demand stated by the register is an accurate figure under the regulations and precedent set by the Inspectorate. However, even if the figure is accepted at 114, the Council has demonstrated at paragraph 4.14 of its Self-Build Topic Paper that its self-build delivery figures are based on "Planning permissions benefitting from exemption from CIL".[6] This brings into doubt the accuracy of the self-build delivery figures for the Borough, because CIL self-build exemptions at the point of permission do not prove that the approval was delivered as a self-build home. Only a subsequent CIL Part 2 exemption can confirm such delivery, and this appears not to have been tracked.

9.2.5 As section 123 of LURA requires counted schemes to actually be carried out as self-build and custom housebuilding, we submit that the lack of Part 2 CIL data casts doubt on the true extent of self-build delivery in the Borough.

Local Plan examination of self-build delivery

9.2.6 While the Council had also identified a forward supply pipeline of 150 plots across three strategic site allocations in the emerging Local Plan (Policies SS11, SS12 and SS13), the Inspectors examining the Local Plan issued their Post Hearings Letter on 4 August 2026 (document ID9, Appendix 3) and found that the self-build requirement on these strategic sites is unsound and should be deleted. The Inspectors noted that the lower level of need identified by the Council is "capable of being met by windfalls". This is directly relevant to this application: the proposal is a windfall site, on which the Council will for now be reliant to meet its forward supply obligations.

Executed Unilateral Undertaking

9.2.7 To confirm that this development will be carried out and occupied as a self-build dwelling in accordance with the Self-Build and Custom Housebuilding Act 2015, an executed Unilateral Undertaking has been submitted with this application. It is entered into by the applicant, Mr Bilbil Shehu, as the freehold owner of the Site and the person with a legal interest in the land, with his son, Mr Zaim Shehi, joining as the intended self-builder and occupier. As conditions cannot be attached to a permission in principle, and a permission in principle cannot itself be implemented, the Undertaking is drafted to bind the land on the grant of any technical details consent pursuant to this permission in principle, and to apply to the development carried out under it. This ensures that the self-build status of the proposal is secured at the stage at which development can lawfully

[5] APP/T2350/W/23/3335737, paragraph 12

[6] See Appendix 2

proceed, and that any permission contributes meaningfully to the Council's statutory delivery obligations. Should the Council prefer, the applicant would equally be willing to enter into the obligation at the technical details consent stage.

10 Additional Material Considerations

10.1 Sustainability and connectivity

10.1.1 Forest Road (B3034) is a classified road providing reasonable connectivity to Wokingham town centre and the wider settlement hierarchy. Binfield, while in a different council district, is fully accessible by pedestrian pavement just 1,000 m away, with the centre of the village 1,600 m away. Binfield provides local people with a wide range of services and facilities, including schools, shops, a doctor's surgery and wider transport facilities. The pavement adjacent to the Site is clearly in situ for the residents of nearly 50 homes along Forest Road to access Binfield for these purposes. A local pub and restaurant (The Warren) is accessible directly on foot by the same pavement, just 500 m away.

500 m	1,000 m	1,600 m
The Warren pub and restaurant	Edge of Binfield, by pavement	Binfield village centre, by pavement

10.2 Thames Basin Heaths SPA

10.2.1 As noted earlier in this Statement, the Site falls within the 7 km zone of influence of the Thames Basin Heaths Special Protection Area but is outside the 5 km zone. No SANG contribution is therefore required. The development is below the threshold at which an in-combination assessment within the 7 km zone would be required (50 dwellings), but the applicant confirms a willingness to meet any applicable SAMM contribution by way of planning obligation at TDC stage. The SPA does not represent a material constraint to the principle of development.

11 Planning Balance and Conclusion

11.1 This Statement has demonstrated that:

- The Site constitutes previously developed land within the meaning of Annex B of the August 2026 NPPF, by virtue of the rural character of its location and the fact that it does not fall within a built-up area. The NPPF's exclusion of residential gardens 'in built-up areas' from the PDL definition does not apply.
- The proposal therefore falls squarely within Policy S5(1)(d) of the August 2026 NPPF (the redevelopment of previously developed land), for which there is a presumption in favour of development, and the proposal should be approved unless its adverse effects substantially outweigh its

benefits. The benefits of the proposed scheme include but are not limited to:

  - the delivery of a self-build home that itself commands *"substantial weight"* in the planning balance under Policy HO7 of the NPPF, as an evidenced housing need in the community;
  - Wokingham Borough's statutory obligations under the Self-Build and Custom Housebuilding Act 2015 are directly addressed by this application;
  - the addition of a dwelling that contributes to the Council's significant five-year land supply shortfall, which is currently set at just 2.5 years;
  - making effective and efficient use of previously developed land, consistent with the national objective in Policy L1(1)(a)(i) of the NPPF that previously developed sites "of all sizes" should help meet identified needs; and
  - making better use of underutilised land, to which Policy L2(1)(b) of the NPPF attaches *"substantial weight"*.

- In assessing the adverse effects, we have shown that the Site is located in an area that the Council has previously considered (in the 2019 application at Carlisle Lodge) to be a landscape of *"moderate quality and condition, with a moderate sensitivity"*. The Site is also not 'isolated' under new NPPF Policy S5(3) or the established case of *Braintree*. Further, the Site falls outside the Green Belt, no SANG contribution is required (and any SAMM contribution can be secured at TDC stage), no listed buildings are affected, and the Site is not within a Conservation Area. Finally, the proposal is modest in scale (a single dwelling set in the context of 25 dwellings on the other side of the road, and directly adjacent to Carlisle Lodge) and any harm to the character and appearance of this *"moderate quality"* countryside could therefore only be limited, and capable of mitigation through sensitive design at TDC stage in any event.
- Measured together, we therefore submit that the adverse effects of the new home cannot reasonably be considered to *substantially* outweigh its benefits.
- We have also shown that Wokingham's housing land supply position engages Policy S5(1)(j) (development addressing an unmet housing need in a location physically well-related to the settlement of Binfield) as an additional national policy basis for permission. Under this policy, the NPPF directs that the application should therefore be approved unless its adverse effects substantially outweigh the benefits (the conclusions for which are the same as above, in favour of the development).

11.2 On balance, we submit that the principle of development is therefore appropriate and Permission in Principle should be granted.

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B H

APPENDIX 1

Wokingham Borough Council - WBC 59: Update to Table 3A, Self Build and Custom Housebuilding Topic Paper (HO11) *Published 23 April 2026. Revised register figures removing 167 individuals from Part 1* (see paragraph 9.2.2 of this Statement).

(Overleaf)

Update to Table 3a - Self-build and custom housebuilding topic paper (2024) (HO11)

The following provides an update to Table 3a of the Self-build and custom build topic paper (HO11), reflecting the audit of the local connection test in 2025.

The update includes the following:

- Two additional base periods: 2023-24 and 2024-25.
- Part 1 entrants adjusted to reflect those meeting the local connection test, following the audit.

For clarity:

- A: The number of entrants on Part 1 of the self-build register prior to the audit of the local connections test (data presented within the topic paper HO11).
- B: The number of entrants which were removed from Part 1 of the self-build register due to not meeting the local connections test.
- C: The number entrants that remain on Part 1 of the register as they meet the local connections test.

Base period	**A: Additions to Part 1 (prior to local connection test audit)**	**B: Number removed as not meeting local connection test**	**C: Additions to Part 1 that meet local connections test (following the audit)**
Apr 2016 – Oct 2016	63	50	13
Oct 2016 – Oct 2017	106	98	8
Oct 2017 – Oct 2018	10	4	6
Oct 2018 – Oct 2019	18	3	15
Oct 2019 – Oct 2020	15	0	15
Oct 2020 – Oct 2021	39	12	27
Oct 2021 – Oct 2022	9	0	9
Oct 2022 – Oct 2023	6	0	6
Oct 2023 – Oct 2024	7	0	7
Oct 2024 – Oct 2025	8	0	8
Total Part 1 Register (2016 – 2025)	281	167	114
Average increase per base year (10 years)	28.1		11.4
Project increase from 2025/26 – 2039/40 (15 years):	421.5		171
Total projected number of entrants from April 2016 – October 2040	702.5		285

APPENDIX 2

Wokingham Borough Council - Self Build and Custom Housebuilding Topic Paper (HO11), extract *Delivery figures based on "planning permissions benefitting from exemption from CIL"* (see paragraph 9.2.4 of this Statement).

(Overleaf)

Update to Table 3a - Self-build and custom housebuilding topic paper (2024) (HO11)

The following provides an update to Table 3a of the Self-build and custom build topic paper (HO11), reflecting the audit of the local connection test in 2025.

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Oct 2017 – Oct 2018	10	4	6
Oct 2018 – Oct 2019	18	3	15
Oct 2019 – Oct 2020	15	0	15
Oct 2020 – Oct 2021	39	12	27
Oct 2021 – Oct 2022	9	0	9
Oct 2022 – Oct 2023	6	0	6
Oct 2023 – Oct 2024	7	0	7
Oct 2024 – Oct 2025	8	0	8
Total Part 1 Register (2016 – 2025)	281	167	114
Average increase per base year (10 years)	28.1		11.4
Project increase from 2025/26 – 2039/40 (15 years):	421.5		171
Total projected number of entrants from April 2016 – October 2040	702.5		285

APPENDIX 3

Extract pp.4-5 from Inspectors' Post Hearings Letter - ID9, Wokingham Local Plan Update Examination Dated 4 August 2026. Self-build requirement on strategic sites SS11–SS13 found unsound; self-build need *"capable of being met by windfalls"* (see paragraph 9.2.6 of this Statement).

(Overleaf)

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 growth[1] 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.