

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