Examination of the Medway Local Plan 2041

Response to Inspectors' Matters, Issues and Questions
For Taylor Wimpey Strategic Land

Matter 13: Site Allocations

Policy SA8: Hoo St Werburgh and Chattenden

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Appendix A Wokingham Local Plan Inspectors' Post Hearings Letter

1 Introduction

1.1.1 Stantec is instructed by Taylor Wimpey Strategic Land to submit this hearing statement in response to the questions posed under Matter 13 of the Inspectors' Phase 2 Schedule of Matters, Issues and Questions ('MLP.ED35').

1.1.2 This statement responds to Policy SA8: Hoo St Werburgh and Chattenden, covered by questions 13.92 to 13.106.

1.1.3 In addition, we have commented on issued raised by Taylor Wimpey Strategic Land through the Regulation 19 Pre-Submission consultation (including representations it made as a member of the Hoo Consortium at that time) regarding Criterion 3 relating to the requirement for a strategic landscape corridor, and the status and content of the Concept Plan (Figure 14).

2 Matter 13: Site Allocations

2.1 Policy SA8: Hoo St Werburgh and Chattenden

13.92 What is the justification for directing a significant proportion of growth (circa. 4,700 new homes) to Hoo St Werburgh and Chattenden?

2.1.1 This issue has already been largely addressed through statements and discussion on Matter 2 of the Phase 1 hearings (see Matter 2, Q2.10). In summary, the justification for the proportion of growth directed to Hoo St Werburgh and Chattenden is set out in the assessment of spatial distribution options in the Regulation 19 Sustainability Appraisal Report (Volume 2, principally Tables 5.5 and 5.6) (ref: A3.2) and the Council's Site Selection Topic Paper (ref: B22.1, noting sections 2.4 and 2.5).

2.1.2 Hoo St Werburgh is a sustainable settlement which is not subject to any NPPF footnote 7 policy constraints and has sufficient land available which is suitable to accommodate the quantum of development proposed. This includes the proposed allocation of Land West of Hoo promoted by Taylor Wimpey Strategic Land.

13.93 How does the allocation accord with the Plan's settlement hierarchy and spatial development strategy?

2.1.3 The Spatial Development Strategy in the Local Plan (pages 25-27) identifies that, outside of the identified regeneration areas, Hoo St Werburgh is one of the focuses for "large scale growth" in the area. The allocation of homes proposed in Policy SA8 accords with this approach.

13.94 What reasonable alternatives were considered and why were they discounted?

2.1.4 Please refer to our response to Q13.92 above.

13.95 What evidence demonstrates that the transport network can accommodate the scale of development proposed?

2.1.5 The evidence that demonstrates the transport network can accommodate the scale of development proposed is provided by the Medway Strategic Transport Assessment (STA), which has assessed the cumulative transport impacts of the New Local Plan allocations on both the local and strategic highway networks.

2.1.6 The STA identifies that, in the absence of mitigation, the A289/A228 corridor serving the Hoo Peninsula would experience capacity constraints. To address these impacts, the STA has developed and tested mitigation packages for a number of key junctions, including:

- A228 Peninsula Way / Main Road Hoo
- A228 Peninsula Way / Dux Court Road / Bells Lane
- A228 Peninsula Way / Roper's Lane
- Sans Pareil Roundabout
- Four Elms Roundabout

2.1.7 The assessment demonstrates that the identified mitigation measures would provide significant improvements to the operation of the local highway network and assist in accommodating the forecast traffic demand associated with planned growth.

2.1.8 In relation to the Strategic Road Network, the STA identifies M2 Junction 1 as the junction most affected by traffic associated with Policy SA8. A merge/diverge assessment has been undertaken which identifies the need for enhancements on the A289 southbound diverge and the M2 eastbound merge. An improvement scheme for the M2 eastbound merge is included within the Local Plan mitigation strategy. This includes a design review, a safety review and cost estimate.

2.1.9 The deliverability of the required mitigation is further supported by commitments secured through development proposals. For example, the Transport Assessment for Land West of Hoo (Allocation HHH8) identifies impacts at the A228 Peninsula Way / Main Road Hoo junction and Four Elms Roundabout. The applicant has proposed a financial contribution of £4.47 million, to be secured through an appropriate planning obligation should the development be consented.

2.1.10 The STA therefore provides evidence that, subject to the implementation of the identified mitigation measures, the transport network can accommodate the scale of development proposed within Policy SA8 accords with paragraphs 109-111 of the NPPF.

13.96 What are the key transport infrastructure requirements for Policy SA8?

2.1.11 The key transport infrastructure requirements for Policy SA8 comprise the delivery of high-quality walking and cycling connections, enhancements to bus services, safeguarding land for potential future passenger rail services, and the implementation of strategic highway mitigation measures identified through the Medway Strategic Transport Assessment (STA), including improvements along the A228 corridor and at M2 Junction 1. These measures are intended to ensure that the transport network can accommodate the growth proposed within the Hoo St Werburgh and Chattenden area.

2.1.12 Land West of Hoo (Allocation HHH8), should it be consented, will contribute to the delivery of these requirements by:

- Providing improvements to the footway provision on Main Road, ensuring a continuous pedestrian route between Chattenden and Hoo St Werburgh, including suitable crossing facilities.
- Providing high-quality pedestrian and cycle infrastructure throughout the site, particularly along the proposed spine road.
- Designing the spine road as a local distributor road capable of accommodating future bus services through the site. Discussions have been held with Arriva, who support in principle the potential diversion of the existing 191 service through the site and neighbouring Allocation HHH11.
- Committing a financial contribution of £4.47 million towards the highway mitigation measures identified through the STA.

13.96 What are the key dependencies for delivery of transport improvements and are they funded and committed?

2.1.13 The key transport infrastructure improvements identified through Policy SA8 and the Strategic Transport Assessment (STA) are dependent upon the coordinated delivery of development across the Hoo Peninsula and the collection of developer contributions towards the identified mitigation measures. The principal dependencies include the delivery of highway improvements along the A228 corridor, enhancements at M2 Junction 1, improvements to active travel infrastructure, and enhancements to local bus services.

2.1.14 In respect of Land West of Hoo, the applicant has proposed a financial contribution of £4.47 million towards the identified highway mitigation package, to be secured through an appropriate planning obligation should the development be consented. The site would also deliver its site-specific bus, walking and cycling infrastructure directly.

2.1.15 The funding and commitment of the wider strategic mitigation package are matters for Medway Council and the relevant infrastructure providers. The applicant is therefore not in a position to confirm the funding status of the package as a whole. However, the STA has identified and costed the measures required, providing a basis for securing proportionate contributions from development.

13.97 Have National Highways and public transport providers confirmed that the proposed mitigation is sufficient?

2.1.16 National Highways has been closely involved in the preparation of the Medway Local Plan evidence base and the development of the Strategic Transport Assessment (STA). The Examination Statement of Common Ground confirms that National Highways reviewed the STA documents and that its comments were taken into account prior to finalisation. The Statement of Common Ground also confirms that National Highways is content that the STA provides appropriate and proportionate evidence to demonstrate the methodology and assumptions used within the assessment and that these have been developed and, in principle, agreed.

2.1.17 The Statement of Common Ground also identifies a number of matters that remain under discussion, including further analysis relating to cumulative impacts at M2 Junction 1. National Highways and Medway Council have agreed a programme of ongoing work to address these matters.

2.1.18 For Land West of Hoo (HHH8), the submitted planning application was informed by scoping discussions and ongoing liaison with National Highways throughout the planning process. National Highways subsequently raised no objection to the application, subject to conditions.

2.1.19 In relation to public transport operators, the applicant is not aware of any published statement within the Local Plan evidence base confirming that bus operators consider the proposed mitigation package to be sufficient. However, the applicant for Land West of Hoo (HHH8) has separately engaged with Arriva regarding the potential diversion of the existing 191 service through Land West of Hoo and Allocation HHH11, with Arriva indicating support in principle for this approach.

13.98 What are the consequences to the delivery of SA8 if key transport infrastructure is delayed or does not come forward?

2.1.20 A delay in the delivery of strategic transport infrastructure would not necessarily prevent development from coming forward, particularly where development has already been consented and the relevant requirements have been secured through planning conditions or obligations. However, it could delay the operational and sustainable transport benefits anticipated through the STA, meaning that the cumulative effects of planned growth may not be mitigated as early or as fully as intended.

2.1.21 Land West of Hoo (HHH8) would make a proportionate contribution towards the wider mitigation package and would deliver its site-specific pedestrian, cycle and public transport infrastructure directly. The delivery of individual sites would therefore continue to be governed by their respective planning permissions and obligations, while the coordination and timely delivery of the wider strategic mitigation package would remain important in supporting growth across the Hoo Peninsula.

13.99 How have impacts on internationally and nationally designated ecological sites been assessed?

2.1.22 The Council's assessment of the Local Plan's impacts on internationally and nationally designated ecological sites is provided in the Submission Habitats Regulation Assessment (HRA) (Documents A4.2 and A4.3).

2.1.23 At the request of the Inspectors, in June-July 2026, the Council undertook a consultation on the Medway Local Plan supporting evidence documents. The documents subject to this consultation included the Submission HRA (Documents A4.2 and A4.3). Natural England responded to this consultation and their response was published (see response E.17 (PDF page 136 of MLP/ED16A).

2.1.24 It is anticipated that the Council will be in a position to provide a further update on ongoing engagement with Natural England in its hearing statement and/or at the hearing on 25th November.

13.100 What mitigation measures are necessary in respect of recreation pressure, air quality and wider ecological impacts?

2.1.25 In relation to Land West of Hoo, through Taylor Wimpey Strategic Land's recent appeal and in accordance with the Council's requirements, financial contributions towards the Council's Strategic Environmental Management Strategy (c. £750,000) and to Bird Disturbance Mitigation (SAMMS) (c. £150,000).

2.1.26 In addition, a Wild Bird and Skylark Mitigation Scheme within the site is to be secured through the s106 Agreement. This will be managed and maintained in perpetuity.

13.101 Is there sufficient certainty that these mitigation measures can be secured?

2.1.27 Yes. Please see above.

13.102 What evidence demonstrates that water resources and wastewater infrastructure can support the scale of development proposed?

2.1.28 No further comments.

13.103 What assessment has been undertaken of the impact of development on the historic environment, including Chattenden Conservation Area, listed buildings and archaeological interests?

2.1.29 The *Council's assessment is contained in the Medway Local Plan Heritage Asset Review (HAR) (Document ref. B9). Alongside consideration of the historic environment through the wider evidence base including the SHLAA and the Sustainability Appraisal process, the HAR identifies the relevant assets that have been considered as part of preparing the Local Plan and decisions regarding the location of future growth.*

2.1.30 *In assessing the planning application and appeal for Land West of Hoo, no concerns were raised by the Council and relevant statutory consultees relating to impact on the historic environment.*

13.104 What evidence demonstrates that the allocation is achievable and viable?

2.1.31 As advised in our response to the R19 consultation and to the Phase 1 hearings, due to viability, in accordance with adopted and emerging local planning policies, reduced affordable housing provision may need to be negotiated on a site-by-site basis to help ensure that the development of allocated sites will be brought forward broadly in accordance with the timescales expected by the Council.

13.105 What are the principal risks to delivery and how have they been addressed?

2.1.32 Timely determination of planning applications and the grant of planning permissions.

2.1.33 We note that the Council has recently suggested that capacity on the road network in the area as a potential constraint to the phasing of delivery. This was not a refusal for refusal in relation to the appeals recently subject to inquiries in June and July 2026 for developments west of Hoo (HHH8, 6004418) and land off Ratcliffe Highway (HHH11, 6002996).

2.1.34 Criterion 5 of Policy SA8 requires the preparation of a strategic masterplan for Hoo and Chattenden. Taylor Wimpey is not aware that the Council has commenced work on a strategic masterplan for the area, or that its preparation is being progressed by other parties. If the Council requires the production of a strategic masterplan as a pre-requisite for individual development proposals, this could delay delivery in the area unless work to prepare the strategic masterplan begins in the very near future.

2.1.35 Beyond the above, to the west of Hoo, Land off Ratcliffe Highway (HHH11) has recently been granted planning permission on appeal and, at the time of writing, the appeal decision awaited for Land West of Hoo (HHH8) which, if approved, would make a significant contribution towards the delivery of development envisaged in Policy SA8 of the Local Plan. The masterplanning of these two schemes was coordinated between the applicants which, inter alia, will facilitate the provision of a joint bus service to serve the developments, to be secured through the s106 agreements.

2.1.36 Taylor Wimpey is committed to commencing the delivery of development from Land West of Hoo at the earliest practicable opportunity with the potential to contribute towards housing delivery in the first five years post-adoption.

13.106 How will the comprehensive development of the area be secured?

2.1.37 As referenced above, criterion 5 of Policy SA8 requires the preparation of a strategic masterplan for Hoo and Chattenden.

2.1.38 In relation to the proposals for Land West of Hoo and the adjoining proposal by Gladman (site ref. HHH11), conditions and obligations include measures to secure comprehensive planning of development and infrastructure across the two scheme and proportionate contributions calculated by the Council towards strategic infrastructure provision to support Local Plan growth. In the absence of a strategic masterplan, this has secured a comprehensive approach towards development west of Hoo.

Other Matters – Criterion 3 and Figure 14

2.1.39 Criterion 3 of Policy SA8 requires development at Hoo St Werburgh and Chattenden to deliver a "strategic landscape corridor". This is shown (labelled "strategic green corridor") in Figure 14: Hoo St Werburgh and Chattenden Concept Plan.

2.1.40 The status of Figure 14 is not clearly defined. It is not referred to in Policy SA8 and the only reference to it in the Local Plan is found at paragraph 14.9.13 which simply refers to its existence and that it is a concept plan.

2.1.41 The status of concept plans is a topic that has been debated in other recent local plan examinations including in Wokingham and Milton Keynes. In the case of Wokingham, the Inspectors have issued a post-hearings letter (see Appendix 1) and concluded:

> **"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."**

2.1.42 The approach taken by the Wokingham Inspectors rightly secures an effective approach, providing clarity to decision makers and members of the public regarding the status of concept plans for guiding the preparation of future strategic masterplan and development proposals for individual sites.

2.1.43 We request that modifications be made to the Medway Local Plan to clarify that Figure 14 and other Concept Plans are "indicative only".

2.1.44 With regard to the inclusion of a strategic landscape corridor in Figure 14 and in particular how it is illustrated as a wide green 'swath', Taylor Wimpey have previously raised objections that this is not justified by the evidence available (the Council's Landscape Character Assessment dated June 2024, document ref: B7).

2.1.45 The LCA does not expressly propose a strategic landscape corridor and no information is given to support the extent of any such corridor.

2.1.46 Whilst avoiding straying into detail relating to the planning application and appeal for Land West of Hoo, the Local Plan Inspectors should be aware that the Council has sought to attach weight to an asserted conflict with the proposed strategic green corridor shown in Figure 14. In our view, this demonstrates why it is important not to establish an unjustified constraint to the future detailed planning of development at Hoo St Werburgh.

2.1.47 In conclusion, we request modifications to Figure 14 that either reduce the width of the proposed strategic landscape corridor or, preferably, to delete it entirely. This modification to Figure 14 should be made alongside consequential modifications to criterion 3 of Policy SA8.

Appendix A Wokingham Local Plan Inspectors' Post Hearings Letter

The Planning Inspectorate

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

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Ian Bellinger
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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 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.

- **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