

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
THE TOWN & COUNTRY PLANNING (ENFORCEMENT) (INQUIRIES
PROCEDURE) RULES 2002 and PINS PROCEDURAL GUIDE 2022**

PROOF OF EVIDENCE
Ian Church BA(Hons) MA MRTPI

APPEAL SITE: LAND NORTH OF READING ROAD, ARBORFIELD

**DEVELOPMENT: OUTLINE APPLICATION FOR THE PROPOSED ERECTION
OF UP TO 111 NO DWELLINGS WITH ASSOCIATED
WORKS, PARKING, LANDSCAPING, PUBLICLY
ACCESSIBLE OPEN SPACE AND ACCESS FROM READING
ROAD (ALL MATTERS RESERVED EXCEPT FOR MEANS
OF ACCESS).**

LPA REFERENCES: 243099

PINS REFERENCES: APP/X0360/W/25/3371069



WOKINGHAM
BOROUGH COUNCIL

WITNESS BACKGROUND

My name is Ian Church. I hold a Bachelor of Arts (Hons) degree in Geography awarded by Durham University, and a Masters in Town and Regional Planning awarded by the University of Sheffield. I am a full member of the Royal Town Planning Institute.

I am employed by Wokingham Borough Council as Operational Lead – Planning Policy in the Planning Policy and Infrastructure Service, which includes responsibility for land use planning policy.

I joined Wokingham Borough Council in January 2018. Prior to this, I worked for The Royal Borough of Windsor and Maidenhead and Bracknell Forest Council.

I directly work on Wokingham Borough Council's local plan, housing evidence base studies and land supply assessments. I am familiar with the issues relevant to this appeal.

My proof of evidence provided for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

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1.0 Introduction

- 1.1 This statement provides information that sets out the deliverable housing land supply position in the context of past housing delivery and the plan-making process.
- 1.2 Although it was not anticipated that housing land supply matters will be a key point of discussion during the appeal, this statement provides additional information and seeks to rebut several assertions set out in the appellant's housing land supply evidence regarding the deliverable supply, including specific sites, affordable housing and affordability.

2.0 Deliverable Housing Land Supply

- 2.1 The most recently published full assessment of the housing land supply position is the 'WBC Five Year Housing Land Supply Statement at 31st March 2025' (hereafter referred to as the HLS Statement) (Appendix A).
- 2.2 The HLS Statement concluded a demonstrable deliverable housing land supply of 2.5 years. This calculation is based on the application of the standard method set out in the Planning Practice Guide Housing and economic needs assessment which at the time calculated a Local Housing Need (LHN) of 1,316 dwellings per annum. As a result of the December 2024 changes to the NPPF and PPG the LHN for Wokingham Borough increased from 748 dwellings per annum, which explains a large part of the shortfall.
- 2.3 The council therefore accepts that, without taking account of past over delivery, sufficient deliverable housing sites cannot be demonstrated under current national planning policy and guidance. The shortfall against a five year housing land supply is 3,456 dwellings.
- 2.4 The appellant claims that LHN has been miscalculated, and that LHN is 1,317 dwellings. The appellant calculates LHN to 1,316.66 dwellings, which is then rounded up to 1,317. The council's calculation is 1,316.22 dwellings, which is then rounded down to 1,316. The difference is therefore 0.4 dwellings per annum. The council contends its calculation is correct and LHN should remain 1,316. However, the application of either figure does not alter the housing land supply position of 2.5 years.

3.0 Housing Delivery and Need

- 3.1 It is a matter of fact that housing completions within Wokingham Borough have significantly exceeded all assessments of housing need prior to the December 2024 changes.
- 3.2 This over delivery has inevitably reduced the bank of planning permissions that remain and therefore the short term deliverable housing land supply ahead of a new local plan being adopted.
- 3.3 It is the council's position that the shortfall in the forward looking deliverable housing land supply should be viewed in the big picture of housing supply and delivery exceeding need, with the precise timing of delivery outside the control of the council.
- 3.4 When looking at the big picture of housing supply and delivery it is clear that housing completions have exceeded the housing requirement set out in the Core Strategy local plan and all assessments of housing need, including those calculated by the standard method up to the 2024 changes.

Looking backwards, there has been no shortfall in housing delivery, but in fact a significant boost or advanced delivery.

a) Housing delivery performance compared to housing need

- 3.5 The following provides an overview of housing delivery performance in the context of the housing requirement. It continues by reference to a number of appeal proceedings where Inspectors have noted the strong housing delivery performance and how this is relevant to decision making.

Core Strategy local plan

- 3.6 Core Strategy local plan Policy CP17 set out the housing requirement for the period 2006-2026. Table 1 below sets out housing completions to date against this requirement.

Table 1: Comparison between housing completions and the Core Strategy housing requirement

	Completions (annual)	Completions (cumulative from 2006/7)	Core Strategy CP17 requirement (annual)	Core Strategy CP17 requirement (cumulative)
2006/7	1,011	1,011	600	600
2007/8	482	1,493	600	1,200
2008/9	369	1,862	600	1,800
2009/10	226	2,088	600	2,400
2010/11	217	2,305	600	3,000
2011/12	267	2,572	700	3,700
2012/13	390	2,962	700	4,400
2013/14	488	3,450	700	5,100
2014/15	454	3,904	700	5,800
2015/16	675	4,579	700	6,500
2016/17	967	5,546	723	7,223
2017/18	1,528	7,074	723	7,946
2018/19	1,284	8,358	723	8,669
2019/20	1,555	9,913	723	9,392
2020/21	1,206	11,119	723	10,115
2021/22	1,440	12,559	623	10,738
2022/23	890	13,449	623	11,361
2023/24	849	14,298	623	11,984
2024/25	647	14,945	623	12,607
TOTAL	14,945		12,607	

Green = Cumulative completions have been greater than the cumulative requirement.

- 3.7 Housing completions against the Core Strategy local plan have exceeded the requirement by 2,338 dwellings in the period 2006/07 to 2024/25, significantly boosting the delivery of housing to date. Adding projected completions from sites currently deemed deliverable in the HLS Statement, over the remaining plan period to 2026 would see total completions reach 15,580 compared to the total requirement of 13,230, a significant boost of 2,350 dwellings or 17.8%.

Berkshire (including South Bucks) Strategic Housing Market Assessment (2016)

- 3.8 Following the introduction of the original National Planning Policy Framework (NPPF) in 2012, the council worked in partnership with the other Berkshire local planning authorities to identify the

housing market area or areas in which the authorities were located, and subsequently calculate the objectively assessed need for housing. The study – the Berkshire (including South Bucks) Strategic Housing Market Assessment 2016 – concluded that Wokingham Borough was located within a Western Berkshire Housing Market Area, centred on Reading. The objectively assessed housing need arising from Wokingham Borough was calculated as 856 dwellings per annum over the period 2013-2036. This calculation had regard to the then most up-to-date household projections – the 2012-based sub-national household projections.

- 3.9 For transparency, a number of Inspectors considering appeal processes at the time preferred a higher affordability adjustment than used on the Berkshire (including South Bucks) Strategy Housing Market Assessment 2016. This had the effect of raising the objectively assessed need from 856 to 894 dwellings per annum.
- 3.10 Table 2 below sets out housing completions against the objectively assessed need as calculated by the Berkshire (including South Bucks) Strategic Housing Market Assessment 2016.

Table 2: Comparison between housing completions and the Berkshire (including South Bucks) SHMA 2016

	Completions (annual)	Completions (cumulative)	SHMA (2016)¹ Objectively Assessed Need (OAN)	SHMA (2016) Objectively Assessed Need (cumulative)
2013/14	488	878	856	856
2014/15	454	1,332	856	1,712
2015/16	675	2,007	856	2,568
2016/17	967	2,874	856	3,424
2017/18	1,528	4,112	856	4,280
2018/19	1,284	5,396	856	5,136
2019/20	1,555	6,951	856	5,992
2020/21	1,206	8,157	856	6,848
2021/22	1,440	9,597	856	7,704
2022/23	890	10,487	856	8,560
2023/24	849	11,336	856	9,416
2024/25	647	11,983	856	10,272
TOTAL	11,983		10,272	

- 3.11 Comparing housing completions against the Berkshire (including South Bucks) Strategic Housing Market Assessment 2016 shows that completions have exceeded the defined need by 1,711 dwellings in the period 2013/14 to 2024/25, significantly boosting the delivery of housing to date.
- 3.12 If the higher housing need of 894 dwellings was accepted, completions would still significantly exceed need by 1,255 dwellings over the period.

OAN Sensitivity Testing – Western Berkshire Housing Market Area (2018)

- 3.13 Following the publication of the 2014-based sub-national household projections, the council worked in partnership with the other local planning authorities within the Western Berkshire Housing Market Area to reassess the objectively assessed need for housing. The study – the OAN Sensitivity

¹ Berkshire (including South Bucks) SHMA (2016)

Testing – Western Berkshire Housing Market Area 2018 report - concluded the housing need arising from Wokingham Borough was 801 dwellings per annum 2013 - 2036.

- 3.14 Table 3 below sets out housing completions against the objectively assessed need as calculated by the OAN Sensitivity Testing – Western Berkshire Housing Market Assessment 2018 report.

Table 3: Comparison between housing completions and the OAN Sensitivity Testing – Western Berkshire Housing Market 2018 report

	Completions (annual)	Completions (cumulative)	SHMA Sensitivity Testing (2018) ² Objectively Assessed Need (OAN)	SHMA Sensitivity Testing (2018) Objectively Assessed Need (cumulative)
2013/14	488	878	801	801
2014/15	454	1,332	801	1,602
2015/16	675	2,007	801	2,403
2016/17	967	2,874	801	3,204
2017/18	1,528	4,112	801	4,005
2018/19	1,284	5,396	801	4,806
2019/20	1,555	6,951	801	5,607
2020/21	1,206	8,118	801	6,408
2021/22	1,440	9,503	801	7,209
2022/23	890	10,393	801	8,010
2023/24	849	11,242	801	8,811
2024/25	647	11,889	801	9,612
TOTAL	11,889		9,612	

- 3.15 Comparing housing completions against the OAN Sensitivity Testing – Western Berkshire Housing Market Assessment 2018 report shows that completions have exceeded the defined need by 2,277 dwellings in the period 2013/14 to 2024/25, significantly boosting the delivery of housing to date.

Standard method for calculating Local Housing Need

- 3.16 Through revisions to the NPPF in 2018, a standard method was introduced to calculate Local Housing Need. Local planning authorities were expected to use this standard method to calculate the minimum number of homes needed unless exceptional circumstances applied.
- 3.17 Table 4 sets out housing completions against the scale of Local Housing Need calculated by the standard method for each year since 2018.

Table 4: Comparison between housing completions and Local Housing Need

	Completions (annual)	Completions (cumulative)	Standard Method need (annual) ³	Standard Method need (cumulative)
2018/19	1,284	1,284	864	864
2019/20	1,555	2,839	804	1,668
2020/21	1,206	4,045	789	2,457
2021/22	1,440	5,485	768	3,225
2022/23	890	6,375	781	4,006

² OAN Sensitivity Testing – Western Berkshire Housing Market Area (March 2018)

³ Local Housing Need calculated on 1 April each year.

2023/24	849	7,224	795	4,801
2024/25	647	7,871	1,336	6,137
TOTAL	7,871		6,137	

Green = Completions / cumulative completions greater than Local Housing Need/ cumulative Local Housing Need.

- 3.18 Comparing housing completions against the standard method for calculating Local Housing Need shows that in the five years 2018/19 – 2024/25, cumulative completions have significantly exceeded the Local Housing Need since its introduction. A cumulative total of 7,871 dwellings have been completed against a cumulative need of 6,137 dwellings, an exceedance of 1,734 dwellings. Over this 7 year period this constitutes a 28% boost to housing delivery.

Housing delivery

- 3.26 Table 5 below sets out the results of the Housing Delivery Test for Wokingham Borough since its introduction in the 2018 update to the NPPF. It is clear that completions in Wokingham Borough have significantly exceeded the requirement, again demonstrating strong performance.

Table 5: Housing Delivery Test performance

Year	Performance
2018	157%
2019	175%
2020	200%
2021	189%
2022	205%
2023	169%

Green = Completions exceed the requirement of the Housing Delivery Test.

- 3.27 This high level of past housing delivery has been reflected in data from the 2021 census. Over the 10 year period between census points 2011-2021, the population of Wokingham Borough increased by 15%. This was the third largest of any local authority in south east England (outside London), with only Milton Keynes (15.3%) and Dartford (20%) growing by higher percentages. Given Milton Keynes is a former new town, and now a city, and Dartford includes significant development at Ebbsfleet Garden City, this serves to highlight the level of housing growth in Wokingham Borough in recent years.
- 3.28 This is further reflected in ONS data that sets out changes in dwelling stock for each local authority.⁴ This shows over the 10 year period 2011-2021 the housing stock in Wokingham Borough increased by 14.5%.

Summary

- 3.29 As evident from Tables 1-5, it is a matter of fact that housing completions have exceeded both the adopted housing requirement and all subsequent assessments of housing need, including the standard method for calculating Local Housing Need. The level of exceedance has been significant and is well above the current shortfall in the demonstrable deliverable housing land supply.

b) Other developable land

⁴ Live Table 125 Dwelling stock estimates by local authority district

- 3.30 Looking forward, evidence set out in the HLS Statement shows several developable sites will become deliverable in the forthcoming years. This includes the remaining large phases of the South Wokingham Strategic Development Location (SDL), south of the railway line which has Outline/Hybrid planning permission. Two parcels have been granted Reserved Matters permission totalling 558 dwellings, which are discussed in the following section. A further 1,262 dwellings are included in the developable supply but are likely to come forward sooner, and form part of the deliverable supply in the next 5 years. The South Wokingham Distributer Road (SWDR) is under construction which will connect the already completed eastern phase and provide a new link south of Wokingham town centre. The SWDR is anticipated to open in early 2027, which will provide vehicular access to additional development parcels.
- 3.31 Housing delivery will also continue from other SDLs. For example, the Arborfield Garrison SDL has planning permission for 3,640 new dwellings, of which only 2,043 have been completed (at 31st March 2025). As the delivery of the site is ongoing, 625 dwellings are anticipated to be completed beyond the 5 year period, and therefore form part of the developable supply. This will include market and affordable dwellings, with a variety of different house types delivered by multiple house builders.

c) Disputed site delivery

- 3.32 The appellant disputes delivery from three sites included in the deliverable housing land supply. Two of the sites form parcels of the South Wokingham SDL. The third site is the land at Bridge Farm, Twyford. Contrary to the appellant's assertions, there is a realistic prospect of housing delivery from each site, as explained below.

South Wokingham SDL: Parcels R10 and R11

- 3.33 Parcels R10 and R11 form part of the South Wokingham SDL, south of the railway line, was allocated in the Wokingham Borough Core Strategy for around 2,500 homes and associated infrastructure. The parcels form part of a larger area where Outline/Hybrid planning permission was granted for 1,434 dwellings in July 2024.
- 3.34 A Reserved Matters application for parcel R10 (215 dwellings) was submitted in February 2025 and approved in June 2025. A Reserved Matters application for parcel R11 (343 dwellings) was submitted in March 2025 and approved in July 2025.
- 3.35 Kier and Miller are delivering the parcels, with first completions from both parcels anticipated in 2026/27, as set out in the HLS Statement, page 51. The delivery rates reflect phasing plans submitted by the developers, setting out the completion of each parcel within the five year period.
- 3.36 Construction by Miller Homes at parcel R10 has already commenced. New dwellings are being marketed for sale, and a small number of completions are anticipated by 31st March 2026. First completions are therefore anticipated one year earlier than set out in the HLS Statement. Construction at parcel R11 is due to commence next year and there is a realistic prospect of delivery within the next five years.
- 3.37 The HLS Statement sets out benchmark lead in times and delivery rates, based on averages from sites across the borough. For a site of 100-249 dwellings, the benchmark is 18 months from Reserved Matters decision to first house sale. For a site of 250+ dwellings, the benchmark is 16 months from Reserved Matters to first house sale. As benchmarks these timescales are capable of being exceeded.

3.38 The HLS Statement includes faster lead in times for parcels R10 and R11 than the benchmark figures. However, as shown by parcel R10, this is justified as the lead in times have been exceeded, with first completions within only 9 months of the Reserved Matters permission in June 2025. Although the benchmark timescales are helpful, more weight should be placed on specific information from the developers about their intentions.

3.39 Delivery rates are also capable of being exceeded, which is acknowledged in paragraph 3.30 of the HLS Statement which states:

'It is clear from the local monitoring evidence that developers are able to deliver at a higher rate in the local housing market.'

3.40 As an example, in the year 2024/25, HLS Statement Appendix 2: Completions, shows two parcels at the Arborfield Garrison SDL delivered 90 dwellings in a year from a single developer. Similarly, the developers at the South of M4 SDL have previously delivered in excess of 90 dwellings in a single year. As a result, there is local evidence showing that developers are able to deliver significant new housing in Wokingham Borough, and there is a realistic prospect of achieving the delivery rates set out in the HLS Statement.

3.41 The two parcels are connected to the area north of the railway line (known as Montague Park) which has already been delivered, via a bridge over the railway line. Montague Park includes a primary school, neighbourhood centre (including small scale retail), SANG and open space. As a result, there are local services and facilities nearby, which support the delivery of new homes. The SWDR is under construction, and is anticipated to be completed by spring 2027, which will provide a new link south of Wokingham town centre. This will provide direct access from Montague Park, and parcels R10 and R11 to Finchampstead Road.

3.42 The parcels therefore form part of the wider SDL where significant infrastructure has been delivered, with further infrastructure benefitting from planning permission on land south of the railway line and will be delivered as part of the committed development at the SDL. This includes a second new two form entry primary school, open space, SANG, financial contributions towards Grays Farm sports hub, and various highways and transport projects.

3.43 There are no significant constraints that would prevent or delay the delivery of the parcels, and no evidence has been presented by the appellant to justify why the delivery rates set out in the 5YHLS are not achievable. There is a realistic prospect that delivery rates set out in the HLS Statement can be achieved.

Land at Bridge Farm, Twyford

3.44 Outline planning permission was granted in July 2023. Reserved Matters were submitted in December 2024 and approved in June 2025 for the delivery of 200 dwellings. Croudace Homes will be delivering the site, with first completions anticipated in the year 2026/27. Conditions are currently being discharged regarding various matters, including phasing, electric vehicle charging and other matters. The benchmark lead in times show first house sale 18 months after the Reserved Matters permission, which would be end 2026/early 2027, which is clearly achievable.

3.45 As set out above regarding the South Wokingham SDL, the lead in times are benchmarks and evidence shows they are capable of being exceeded, with development capable of coming forward faster.

- 3.46 There are no significant on site constraints, and a single housebuilder controls the site. The maximum delivery rate is 60 dwellings per annum, and an average of 50 dwellings per annum across the 4 years. Based on local evidence this is clearly achievable, and there is no justification to reduce the delivery set out in the HLS Statement.

4.0 Affordable housing and affordability

- 4.1 The delivery of affordable housing and housing affordability in the borough is also relevant. Government planning policy and guidance seeks to address the general issue of affordability through the introduction of the standard method for calculating Local Housing Need. The government's approach is that the issue of affordability is tackled by building more market homes generally, but it is important to note the impact of house building on average house prices and affordability.

- 4.2 Step 2 of the standard method is to apply an adjustment factor based on the affordability ratio of the area. The ratio is defined by the ratio of median house prices to median workplace earnings.

- 4.3 The PPG confirms that under the standard method it is not necessary to factor in previous under delivery in the calculation of local housing need, since any such under delivery will be reflected in the affordability adjustment. This is confirmed within the PPG Housing and economic needs assessments which states:

"The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately."

(Paragraph: 011 Reference ID: 2a-011-20241212)

- 4.4 This is further confirmed within the PPG Housing supply and delivery which states:

"Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure."

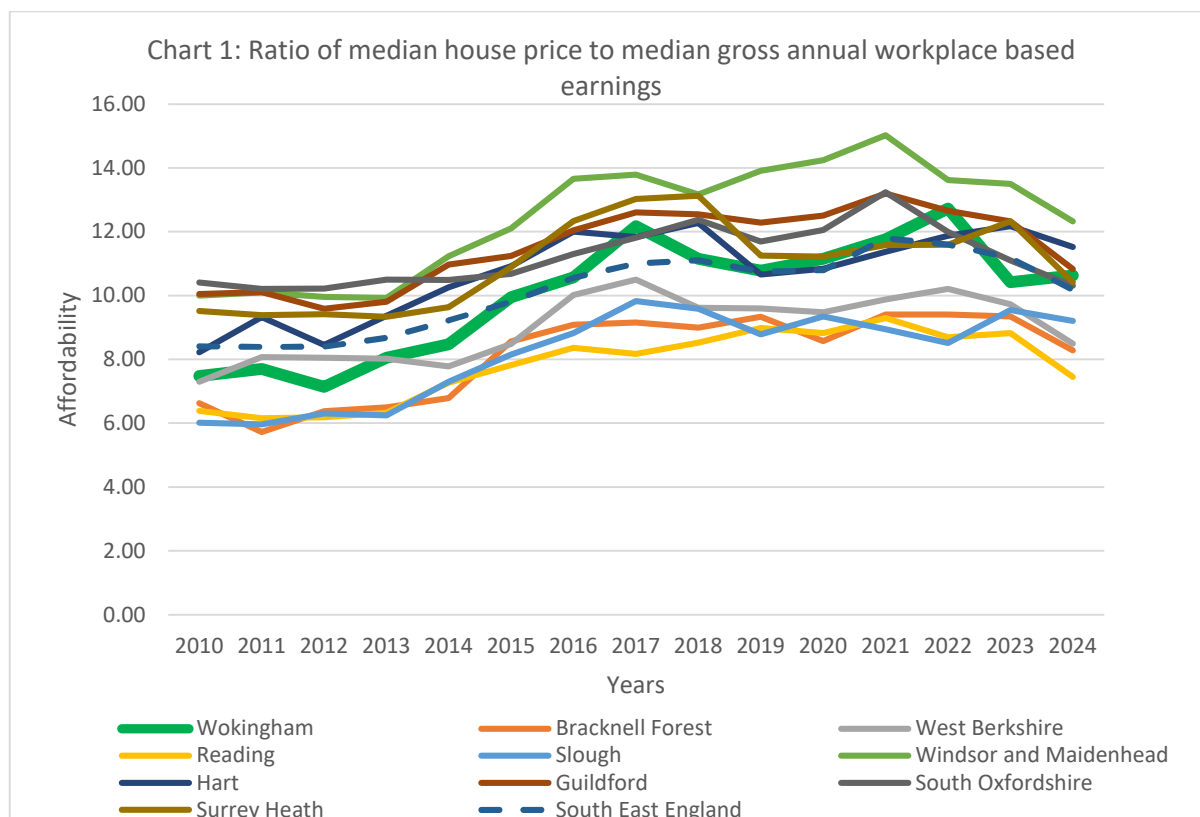
(Paragraph: 031 Reference ID: 68-031-20190722)

- 4.5 The simple logic of the affordability adjustment is therefore that lower housing delivery will see affordability worsening (through increased house prices) with the outcome being a higher local housing need. It must follow therefore that higher delivery leads to improved affordability (through reduced or stable house prices) with the outcome being a lower local housing need.

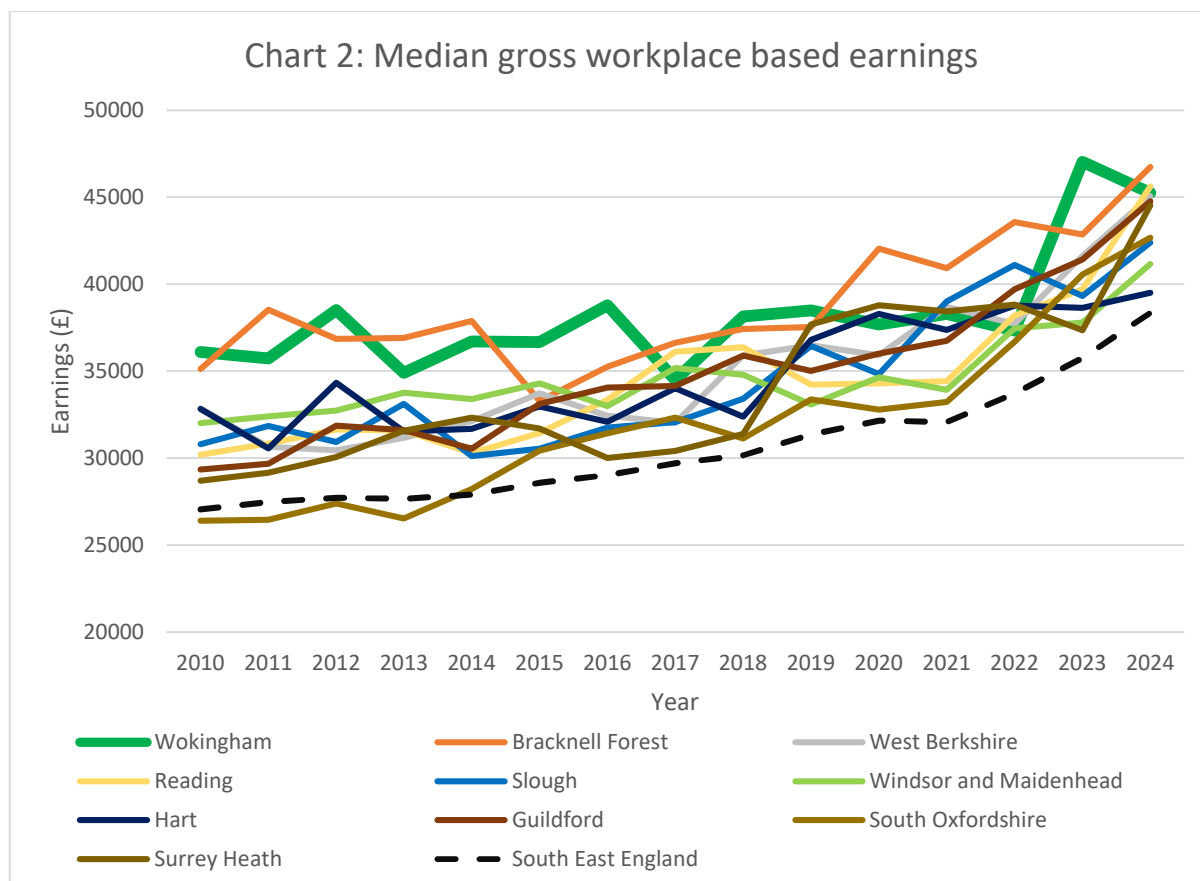
- 4.6 The scale of house building in Wokingham Borough over recent years is at a historical high, and significantly greater than all assessments of housing need. The number of dwellings completed in recent years is shown in Table 1.

- 4.7 Notwithstanding the historical high level of house buildings, it is clear from HM Land Registry data that this has not acted to stabilise or reduce house prices as suggested by the simple logic of the affordability adjustment in the standard method. Whilst the increase in house prices has slowed in some years, the trend is no different to other local authorities that have only just met their requirements or under-delivered.

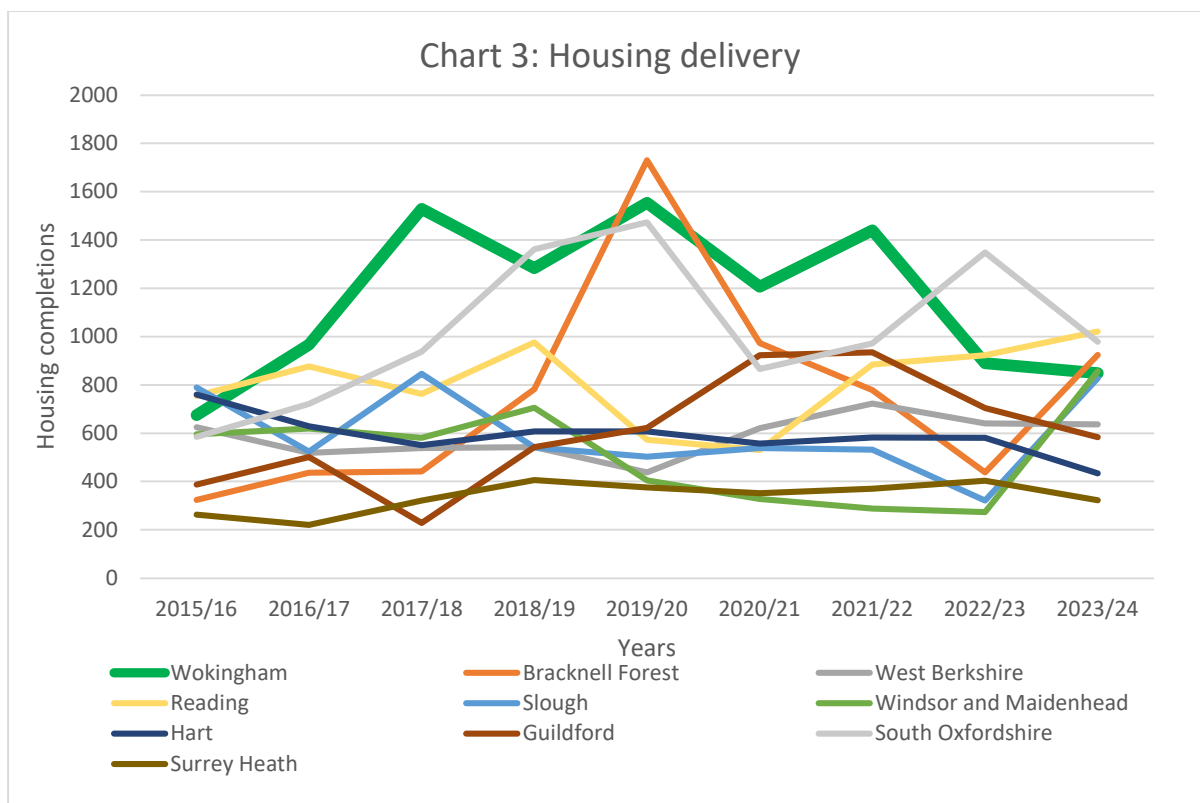
- 4.8 Chart 1 below highlights increases in the affordability ratios across all the Berkshire authorities, and other authorities in Hampshire, Oxfordshire and Surrey. Increases in affordability ratios is not unique to Wokingham Borough, with the same trend across England and the south-east.



- 4.9 House prices are one element of the affordability adjustment when calculating Local Housing Need, the other is workplace based earnings. Chart 2 below shows that workplace based earnings in Wokingham Borough have increase over recent years, which has acted to reduce the affordability ratios shown in Chart 1. As a result, despite high housing delivery, house prices in Wokingham Borough have not stabilised or reduced, and it is increased wages that have affected the affordability ratios.



4.10 Chart 3 shows recent housing delivery across the same areas, using data published by the government in the Housing Delivery Test and monitoring information. This shows that although housing delivery in Wokingham Borough has been higher in most years, other areas where house building has been lower have still experienced similar changes in the affordability ratios, shown in Chart 1.



- 4.11 Even if housing delivery were to continue at the high rate of recent years in Wokingham Borough, these graphs show that affordability may not improve, and that therefore the two elements of the affordability adjustment when calculating Local Housing Need are not operating as the government intends. Simply building additional housing in Wokingham Borough is not the panacea to this issue.

Affordable housing need

- 4.12 The Wokingham Borough Local Housing Need Assessment (LHNA) (2023) (Appendix H) considers the housing needs of different groups, including affordable housing needs.
- 4.13 To calculate the need for affordable housing, the report looks at two categories of households – those that cannot afford to rent or buy, and those who can afford to rent but are unable to buy.
- 4.14 The first category, those households which are unable to afford to rent or buy, constitute those households with the greatest housing needs. Over the period to 2040 the study calculates there are 1,530 households in this category, or 81 households per years over the assessment period.
- 4.15 The second category, are those households who are able to afford to pay market rent and therefore suitably housed, but who are aspiring to home ownership. Over the plan period this is calculated as 5,159 households, which therefore make up the majority of affordable housing needs. Of these households who aspire to home ownership 816 households would be able to afford market home ownership but choose not to. A further 1,900 households would have insufficient income to have a realistic prospect of being able to afford a property at 50% open market value. Of the remaining households with incomes above the minimum threshold, there would be 2,091 households with savings of less than £5,000, and therefore unable to afford the assumed deposit needed to purchase a home.

- 4.16 This results in 352 dwellings needed for households that aspire to homeownership but cannot afford it, who also have at least £5,000 in savings and incomes above the relevant threshold. This means 352 households may be assisted by First Homes.
- 4.17 When combining the households unable to afford to rent or buy, and those that may be assisted by First Homes, there is a minimum affordable housing need over the plan period of 1,881 dwellings, or 99 affordable homes per year.
- 4.18 The appellant claims the earlier version of the LHNA (published 2020) should be used to inform affordable housing needs, which sets out a higher affordable housing need of 407dpa. The appellant claims this is justified because the more recent LHNA (2023) includes an allowance for First Homes as part of the overall supply of affordable housing. The council disagrees with this approach and maintains the more recent LHNA (2023) is the most appropriate basis from which to consider the housing needs of different groups, for the reasons set out below.
- 4.19 The LHNA (2023) identifies an overall affordable housing need of 352dpa which households unable to afford, and households aspiring to home ownership, including those which may be able to access First Homes (Figure 39). LHNA (2023) paragraph 15 notes:

'The important point to note about the above analysis is that all 5,159 households are assumed to aspire to home ownership, but First Homes will only offer a route to home ownership for a very small group. Most of the remaining households are not able to access First Homes because they lack the income to cover a mortgage, or lack savings. It is a little understood quirk of the First Homes policy that a household may be able to afford private rent, but not a First Home and will therefore be allocated to market housing need.'

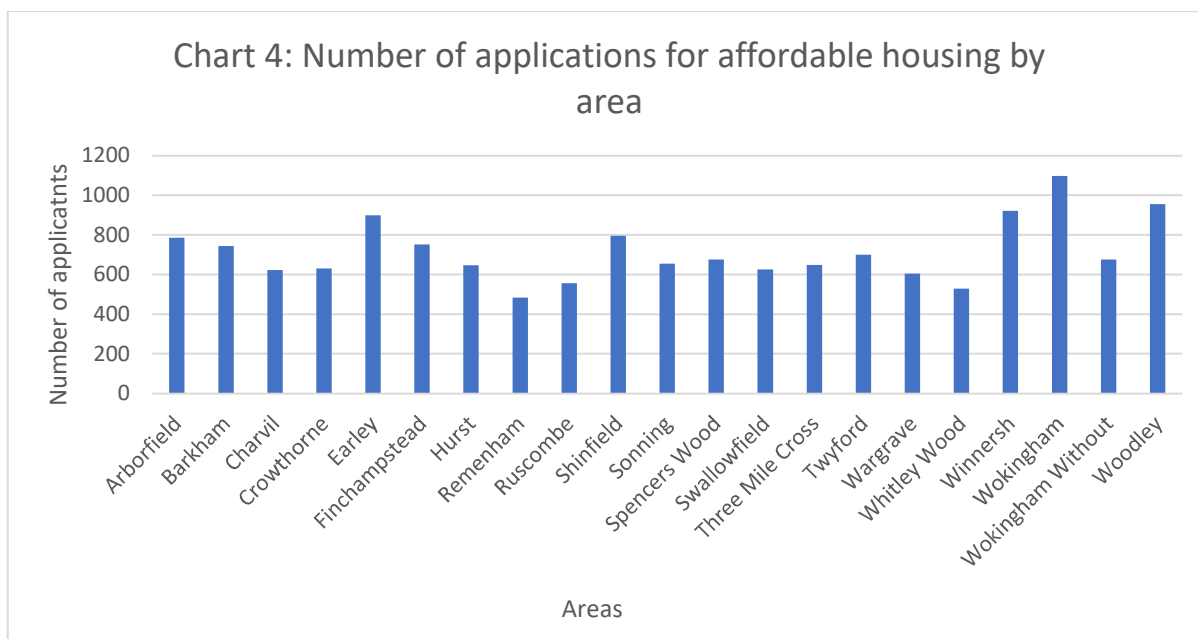
- 4.20 Delivering First Homes in the context of Wokingham borough is also noteworthy. The LHNA (2023) identifies that a 50% discount is required to make First Homes a viable policy in the borough (paragraph 5.76). As a result, to afford a one bed apartment (£275,000) as a First Home, earnings would need to be £52,000 per annum, significantly above the average annual salary. As a result, few First Homes have been delivered in Wokingham Borough with shared ownership instead largely preferred due to the lower annual income required to access this tenure. The LHNA (2023 paragraph 5.60) recognises this when noting that an alternative home ownership product to First Homes may need to be considered.
- 4.21 In addition, the LHNA (2023) uses more recent data, including demographics, housing completions, and information on the housing needs of different groups, including affordable housing. In summary the LHNA (2023) is the most appropriate basis from which to consider affordable housing needs because those aspiring to home ownership are already included in the calculation of affordable housing need, and because First Homes would only provide a route to homeownership for a small number of residents, when compared to the more flexible alternative of shared ownership.
- 4.22 At a local level and as a local housing authority, the council operates a Housing Needs Register, which is open to all people who wish to live in Wokingham Borough. Table 7 below sets out recent information.⁵

⁵ At December 2025

Table 6 Housing Needs Register		
Band	Number of active applications	Priority between bands
Band 1	53	Most urgent need and exceptional need for housing
Band 2	156	Urgent need for housing
Band 3	531	Significant need for housing
Band 4	542	Adequately housed (privately renting)
Band 5	114	Adequately housed outside the borough (owner occupiers)
Total	1,396	

- 4.23 The table helps to understand the differences between the bands on the Housing Register, as set out in the Housing Allocations Policy.⁶ There are currently 1,396 households on the housing register waiting list seeking affordable rented accommodation. Of these 114 individuals are owner occupiers living outside the borough. A further 542 are privately renting and considered to be adequately housed. This results in 740 individuals within the remaining categories. Of this, 209 individuals are considered to be in the most urgent and exceptional need for housing.
- 4.24 The appellant claims that 55% of those on the housing register seek an affordable home in Arborfield, and that there is greater demand for affordable homes in the parish compared to the borough as a whole. The appellant then acknowledges that the quoted figure of 669 preferences for Arborfield includes preferences made for other parts of the borough.
- 4.25 The council has analysed the data available at December 2025. Chart 4 shows the number of applications for affordable housing by area, noting that for those in Band 1 and 2 all areas of the borough are selected due to their higher housing needs. The chart clearly shows that applicants will identify a preference for housing in multiple areas in order to increase the likelihood of gaining an affordable home. The appellant's claims that affordable housing needs in Arborfield are higher compared to other parts of the borough is overstated.

⁶ Wokingham Borough Housing Allocations Policy:
<https://www.wokingham.gov.uk/sites/wokingham/files/2024-05/Wokingham%20Borough%20Council%20Housing%20Allocations%20Policy.pdf>



Affordable housing supply

- 4.26 Looking forward, the council has a healthy pipeline of affordable housing. This includes over 760 affordable homes anticipated to be delivered over the five year period 2025-2030 that form part of the deliverable housing land supply, and a further 1,070 affordable homes after 2030. The council can therefore evidence a minimum future pipeline of over 1,800 affordable homes through a combination of delivery through sites with planning permission, allocations and council approved schemes.
- 4.27 Significant affordable housing is therefore to be delivered as part of the delivery of the Arborfield Garrison SDL, South Wokingham SDL and other large sites. Affordable homes will be delivered in proximity to the appeal site in Arborfield Parish, including 265 affordable homes at Arborfield Garrison in the next 5 years, and a further 219 post 2030. Over 480 affordable homes are anticipated to be delivered at the Arborfield Garrison SDL alone.
- 4.28 Together delivery in the next 5 years is sufficient to meet the needs of all households considered in the most need as currently found on the Housing Needs Register (Bands 1 and 2), in addition to those in Band 3. In addition, the Local Plan Update will also facilitate the delivery of significant affordable housing over the plan period, which will help to meet future needs. Affordable housing delivery from proposed allocations is not included in the future supply, with a higher policy requirement of 40% affordable housing proposed for new SDLs, including at Loddon Valley Garden Village.
- 4.29 Total housing completions since 2006/7 are set out in Table 1. The affordable housing need identified by the SHMA and the LHNA has been exceeded in two of these years, with the highest completions in 2017/18 and 2019/20, when 1,528 and 1,555 total net new dwellings were completed. This serves to demonstrate that very high levels of housing delivery are normally required to deliver higher levels of affordable housing. However, it is unrealistic to expect over 1,500 homes to be delivered in Wokingham Borough year after year to meet the calculation of affordable housing needs.

- 4.30 The 2014 based household projections note a demographic increase of 524 dwellings per annum. On this basis if a further 1,000 homes were delivered each year in Wokingham Borough, it is not clear whether there would be demand for this scale of housing, or therefore whether developers would be willing to consistently deliver at this rate.
- 4.31 New affordable housing should therefore be delivered as part of a plan led approach, which in Wokingham Borough is clearly capable of delivering significant quantities. This helps to provide certainty to communities about new development and is clearly supported by national planning policy.
- 4.32 In terms of affordable housing completions, Table 7 below provides comparative affordable housing delivery information for all of the Berkshire local authorities from 2017/18 – 2024/25. The number of completions achieved by Wokingham Borough Council are significant compared to these other local authorities. Over this period over 35% of all the affordable housing delivered in Berkshire, was in Wokingham Borough, with 2,342 affordable homes.

Table 7 Affordable Housing Completions– Berkshire Local Authorities⁷								
Local authority	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25
Bracknell	16	190	404	210	145	89	276	75
Reading	42	174	265	19	96	96	192	33
Slough	124	46	45	38	14	213	56	52
Royal Borough of Windsor and Maidenhead	2	73	70	66	84	27	50	60
West Berkshire	129	84	116	97	190	180	139	9
Wokingham	482	365	465	187	184	106	316	237

- 4.33 Despite high levels of housing delivery (see Table 1), including affordable housing, affordability ratios in Wokingham Borough have not improved significantly. The affordability ratios form the adjustment factor used in the standard method used to calculate local housing need. The Inspector at the appeal Land at Watmore Lane/Maidensfield (Appendix G) recognised that high levels of housing delivery have not acted in the way government policy anticipates:

‘99. Evidence supplied by the Council indicates that significantly boosting the supply of housing in recent years has not in itself stabilised or reduced house prices. In truth, they have continued to rise sharply. Indeed, if house prices were dictated solely by supply, then Wokingham should, in theory, have seen a reduction in house prices given the extensive scale of delivery in recent years. This in turn should have stabilised or lowered the housing requirement significantly, but that has not been the case.’

- 4.34 As part of the same appeal, the Inspector recognised the council’s record of delivering affordable housing, and the likelihood and implications of delivering a higher level of affordable housing per year (based on the earlier 2020 Local Housing Needs Assessment). It was also acknowledged that

⁷ Department for Levelling Up, Housing and Communities. Table 1011: additional affordable housing supply, detailed breakdown by local authority (20 November 2025)

there is no requirement in national planning policy for affordable housing needs to be met in full, and that the council has taken steps to address affordable housing needs.

‘108. The emerging Local Plan will likely seek to deliver more affordable housing. However, previous trends have shown that delivery has only averaged 23% of total housing completions since 2006/7. Going forward, affordable housing would likely need to exceed 50% of all housing completions to achieve 403-487 affordable homes each year⁵⁴, but it is unclear if this would be viable. Moreover, not all housing schemes will provide affordable housing because they fall below the local threshold triggering the requirement (of five homes). The implication of this is that in recent years the Council has only achieved delivery of affordable housing at around 487 homes a year when total net completions were over 1,500 a year. Such a level of annual growth up to 2036 is unlikely to be a sustainable or achievable means of meeting affordable housing needs because it is twice the Objectively Assessed Need for total housing completions.’ (paragraph 108)

‘109. The above analysis demonstrates that to a large extent, the ability to meet affordable housing need is outside the control of the Council. In recognition of this there is no legal or policy requirement that requires the Council to fully meet the affordable housing needs in its area....He [the appellant] also conceded that the Council were doing what it reasonably could to address affordable housing need, which has included the preparation of a housing strategy and adopting a low threshold for triggering the requirement for affordable housing. This may explain why the Council has delivered relatively well when compared with other authorities in Berkshire.’ (paragraph 109)

‘111. There is some traction to the Council’s argument as it can only do so much. Moreover, the Council’s inability to meet an apparently unassailable affordable housing need could consistently be used to justify departing from the spatial strategy, and thus undermine the public benefit of a plan led system.’ (paragraph 111)

- 4.35 This section sets out the wider context of affordability and affordable housing. This includes the limited impact housing delivery has on affordability ratios in Wokingham Borough, the pipeline of affordable housing to be delivered as part of the plan led approach, and the likelihood and implications of meeting the identified affordable housing needs.

5.0 Local Plan Update

- 5.1 The council is currently in the process of updating its planning policies through the preparation of a new local plan - the Local Plan Update (LPU). The Local Plan Update will deliver the development needs of the borough as defined and required by the government’s planning policy and guidance, ensuring a future supply of deliverable and developable housing land.
- 5.2 The council has made significant progress and the LPU was submitted to the Secretary of State for examination in February 2025, as part of the transitional arrangements set out in the NPPF (2024). Two Planning Inspectors have been appointed, and Part 1 Hearings took place in November 2025. The hearings focussed on legal compliance and procedural requirements, strategic transport, the deliverability of strategic sites, and housing requirement and supply. Part 2 hearings will commence on 17 March 2026 and are programmed to take place over four weeks until June 2026. The Inspectors have published their Matters, Issues and Questions (MIQs) in advance of the Part 2 Hearings

- 5.3 The LPU enables a housing land supply to meet local housing need calculated by the standard method over the plan period to 2040. The LPU proposes the delivery of significant new housing, including a 3,930 dwelling garden village at Loddon Valley, extensions to both the Arborfield Green SDL, and South Wokingham SDL, and substantial new infrastructure.
- 5.4 The appellant refers to housing delivery at LVGV and the delivery assumptions forming part of the emerging local plan. These matters are being discussed as part of the local plan examination, which is the appropriate forum, rather than this appeal. Statements submitted by the council in response to the Inspectors' Matters Issues and Questions (MIQs) acknowledge the ability to demonstrate a five year housing land supply on adoption even if delivery from LVGV was removed from the five year period. The council can provide further information on the emerging local plan as required.
- 5.5 In the meantime, planning permissions continue to be granted for new development across the borough. This includes development at the Arborfield Garrison SDL where a new District Centre is under construction, which includes a Sainsburys supermarket which is now open, and a new Sixth Form building at Bohunt Secondary School. Other large sites also form part of the deliverable and developable housing land supply, as set out in the HLS Statement.

6.0 Housing delivery in Wokingham Borough

- 6.1 Taking into account the big picture of housing delivery, it is clear that the strategy established by the Core Strategy local plan is working to significantly boost supply of new homes and is therefore consistent with the government's objective of significantly boosting the supply of homes as set out in the NPPF.
- 6.2 All evidence and assessments show that the housing requirement or need, whether defined through the Core Strategy local plan, subsequent local authority assessments of need or by the outcome of the standard method to calculate Local Housing Need, has been significantly exceeded when assessed cumulatively.
- 6.3 While I recognise the findings of other appeal inspectors are not binding, it is instructive in my view to consider the approach taken by other Inspectors. In the 2023 appeal at Land east of Lodge Road Hurst (Appendix B), the Inspector clearly recognised the council's deliverable and developable housing supply, and the context of delivering significant additional housing over the wider plan period of the Core Strategy local plan:

'...I do not consider it unreasonable to have regard to the Council's assertion that if projected completions over the remainder of the CS plan period to 2026 were to be taken into account, then total completions would be 15,448 compared to the CS requirement of 13,230 dwellings, resulting in an excess of some 2,218 dwellings and representing a 16.2% oversupply. In this case the dwellings concerned clearly are considered deliverable and there is no good reason to doubt that they will be completed and add to the housing supply within the overall CS period.

In view of these points, and even though the Council is currently unable to demonstrate a deliverable 5-year HLS, falling short by some 863 dwellings, I do not consider it reasonable to ignore the bigger picture, which is that there is a very strong likelihood that the Council will achieve a significant oversupply of dwelling completions over the whole CS period. To my mind this does not signify a Council that is failing in terms of housing provision, but rather one which is performing well and managing to boost the supply of housing over that which it planned for. (Paragraph 31-32)'

6.4 The same Inspector further recognised the high level of housing completions:

‘Reinforcing this view, I note that since the standard method of calculating Local Housing Need (LHN) was introduced in 2018, evidence from the Council shows that housing completions have consistently and significantly exceeded the LHN figure for each of the 4 years in question, providing some 5,391 new dwellings compared to a LHN requirement of 2,166 dwellings¹⁴. (para 33)’

6.5 This significant boost in housing completions has been recognised by Inspectors for several years. By way of illustration, in the dismissed appeal at Land north of Johnson’s Drive, Finchampstead (Appendix C), in 2019 the Inspector noted:

‘...the supply of housing has been significantly boosted...’ (para 51)

6.6 The Inspector dismissing the appeal at Willow Tree House, later in 2022, (Appendix D) similarly recognised that housing supply in Wokingham Borough had been significantly boosted:

‘...based on current projections, the Council anticipates that over the remaining CS plan period to 2026, an additional 1,965 dwellings will be delivered over the minimum requirement. This equates to a significant boost in housing of 14.9% above plan levels.’ (Para 101)

6.7 The Inspector further acknowledged the record of housing delivery when considering the benefits of the scheme:

‘In the context of housing delivery, the Council is therefore meeting the Government’s objectives to significantly boost the supply of housing. For this reason, whilst the presumption in favour of sustainable development applies, this only weighs moderately in favour of the development.’ (Paragraph 153)

6.8 The same Inspector dismissing the appeal Land at Baird Road in 2022 (Appendix E), further recognised increases in housing delivery:

‘...in recent years delivery has been strong, as evidenced in the most recent Housing Delivery Test results.’ (Paragraph 49)

6.9 The appeal Land at St Anne’s Drive, south of London Road, in December 2022 (Appendix F) continued to recognise high levels of housing delivery, including the impact of this delivery on the future housing land supply:

‘Cumulative housing completions over the period 2006/7 to 2020/21 have exceeded the cumulative CS Policy CP17 annual requirement for that period. Furthermore, cumulative housing completions over the period 2018/19 to 2020/21 have exceeded the cumulative annual local housing need calculated using the Standard Method, with Housing Delivery Test (HDT) results, published by the Government, ranging from 157%-200% over that period. To my mind, this indicates a strong housing delivery performance, which can be said to have significantly boosted the supply of housing, in keeping with the National Planning Policy Framework (Framework) objective to do so. This is consistent with the findings set out in a number of recent appeal decisions. I also acknowledge that the shortfall in housing land

supply looking forward is likely to have resulted, at least in part, from the higher than planned rate of delivery in the past.’ (Paragraph 43)

- 6.10 At the recent appeal at Land off Watmore Lane/Maidensfield, Winnersh, (Appendix G) the Inspector considered the latest housing land supply position, and the benefits of additional housing delivery in the context of the delivery record:

‘However, on every relevant⁴³ measure⁴⁴ the Council has over delivered by some way since 2006/7. For instance, on the highest measure⁴⁵ the Council has delivered 10,393 homes against a need for 8,560. The performance against the Housing Delivery test has been exceptional, with the measurement since 2018 being as high as 205% and not lower than 157%.’ (paragraph 98)

‘Because of this, the Council and appellant ultimately agreed at the Inquiry that the affordability adjustment in the standard method should not be the sole means of accounting for past over delivery in my assessment. Recent statements by the Government reinforce this position. Instead, it was agreed by the Council and appellant that over-delivery is capable of being a separate material consideration which can be factored into the weight that should be given to housing delivery as a benefit. Indeed, other Inspectors have taken this approach, including the Inspector in the Lodge Road appeal.’ (paragraph 100)

‘I am also mindful that the current shortfall of around 635 dwellings is overshadowed by the historic over delivery. Considering these points together, the weight I afford to the benefit of housing delivery arising from the appeal scheme is tempered.’ (paragraph 101)

- 6.11 The Inspectors at the appeals at Land east of Lodge Road, and Land off Watmore Lane/Maidensfield, therefore provide the latest recognition of very strong housing delivery in the borough. Both Inspectors acknowledged that this will result in over delivery of housing over the plan period to 2026 of the core strategy local plan.
- 6.12 I acknowledge that the appeal scheme would make a contribution to the council’s housing land supply at some point in the future. However, the appellant claims that because the appeal site is predominantly greenfield land it will be able to deliver quickly and contribute towards the five year housing land supply. However, no evidence has been provided by the appellant to justify this assertion. The council’s HLS Statement sets out benchmark lead in times for different scales of development and that sites in the borough of 100-249 dwellings take on average 49 months from Outline decision date to first house sale. Development is therefore unlikely to be delivered on the appeal site until at least 2030. As an Outline application, a Reserved Matters application will need to be submitted and permitted, followed by the approval of conditions before development can commence. All of these factors adversely affect the timing of development. Together, this means that site will not meet the NPPF definition of ‘deliverable’ for some time and will not therefore contribute towards the five year housing land supply for several years.

7.0 Summary and conclusion

- 7.1 The latest HLS Statement sets out a deliverable housing land supply of 2.5 years. This shortfall must, however, be set within the bigger picture of housing delivery which significantly exceeds the housing requirement and all subsequent assessments of housing need. The strong performance on housing delivery is a material factor that should be considered alongside the technical shortfall in the

deliverable housing land supply. The shortfall cannot be viewed as a failure of policy or to deliver housing and the council is currently promoting an emerging plan.

- 7.2 The appellant claims delivery from two development parcels at the South Wokingham SDL, and land at Bridge Farm, Twyford should be reduced. There is clear evidence that there is a realistic prospect of development at the rates set out in the HLS Statement. No evidence has been provided by the appellant to justify their position, and the lead in times and delivery rates should remain as set out in the HLS Statement.
- 7.3 The council has a good record of delivering affordable housing which contributes towards meeting local needs, particularly when compared to other authorities in south east England. There is a good pipeline of affordable homes as part of both the deliverable and developable supply, including in proximity to Arborfield Parish which can meet the needs of those with the greatest housing needs.
- 7.4 Looking forward, a pipeline of future homes will help to meet identified needs, including from the South Wokingham SDL, Arborfield Garrison SDL and other sites, which benefit from planning permission or a resolution to grant planning permission. In addition, the emerging Local Plan Update sets out the long term development strategy and includes significant new plan-led development. The Local Plan Update is being examined, with Part 2 hearings starting in March 2026. Further updates regarding the examination can be provided during the appeal as required.

Appendices

Appendix A – Five Year Housing Land Supply Statement at 31st March 2025

Appendix B – Land east of Lodge Road, Hurst, appeal decision

Appendix C - Land rear of Johnson Drive, Finchampstead, appeal decision

Appendix D - Willow Tree House, Brookers Hill, Shinfield, appeal decision

Appendix E – Land at Baird Road, Arborfield Garrison, appeal decision

Appendix F – Land west of St Anne’s Drive and south of London Road, appeal decision

Appendix G – Land off Watmore Lane/Maidensfield, Winnersh, appeal decision.

Appendix H – Local Housing Need Assessment (LHNA) (2023)