
**ANNEX 3 TO PLANNING APPEAL PROOF
OF EVIDENCE: AFFORDABLE HOUSING**

**LAND NORTH OF READING ROAD,
ARBORFIELD**

**Appeal against the decision of Wokingham
Borough Council to refuse outline planning
permission for up to 111no. dwellings with
associated works, parking, landscaping,
publicly accessible open space, with access
from Reading Road (All matters reserved save
for means of access)**

Prepared by: Woolf Bond Planning Ltd

On behalf of:

Dandara Southern Ltd and Elstree Land Ltd

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

LPA Ref: 243099

WBP Ref: 9015

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1.0 Introduction

Overview

- 1.1. This Annex on Affordable Housing Need and Supply has been prepared alongside the Appellant's Proof of Evidence on overarching Planning Matters in support of an appeal ("the Appeal") against the decision of Wokingham Borough Council ("the Council") to refuse the outline application ("the Application").
- 1.2. The Application proposed erection of up to 111 no. dwellings (including 40% affordable housing) with associated works, parking, landscaping, publicly accessible open space and access from Reading Road (LPA Ref: 243099) ("the Application Scheme", now "the Appeal Scheme") on land north of Reading Road, Arborfield ("the Application Site", now the "Appeal Site"). All matters other than access are reserved.
- 1.3. Wokingham is an authority which is unable to demonstrate a five-year supply of housing land, in conflict with the requirement at paragraph 78 of the National Planning Policy Framework (NPPF) to identify and update annual a supply of specific, deliverable sites sufficient to provide a minimum of five year's worth of housing against the local housing need figure. The inability to demonstrate such supply is contrary to the Government's aim, as set out in paragraph 61 NPPF to significantly boosting the supply of homes.
- 1.4. Alongside the failure to show a five year supply, the Council has had significant challenges in addressing affordable housing need.

2.0 Identified Affordable Housing Need and Supply Position

Overview

- 2.1. The Appeal Scheme proposes the on-site provision of up to 44 affordable dwellings, which amounts 40% of the total number of dwellings to be provided., which is compliant with Development Plan policy CP5.

Affordable Housing – Policy and Guidance

- 2.2. The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the National Planning Policy Framework (2012, 2018, 2019, 2021, 2023 and 2024 versions).
- 2.3. The NPPF is a material planning consideration. It is important in setting out the role of affordable housing in the planning and decision-making process.
- 2.4. The NPPF sets a strong emphasis on the delivery of sustainable development, including affordable homes, at paragraphs 20 and 63.
- 2.5. Paragraph 61 clearly sets out the Government's aim to "boost significantly the supply of homes" while throughout the NPPF the importance of affordable housing is highlighted (paragraphs 11dii, 63, 64, 65, 66, 67, 71, 76, 82, 154f, 156 and 157).
- 2.6. The need for affordable housing and importance is emphasised in many Government publications, including:
- Building the Homes We Need ministerial statement by the Deputy Prime Minister on 30th July 2024. (CD08.02)
 - Written Ministerial Statement made by the Minister of State for Housing and Planning on 12 December 2024 (Publication of new NPPF). (CD08.03)
 - Statements by the Chancellor associated with the publication of the

National Infrastructure Strategy (19th June 2025)

Evidence of Affordable Housing Need

- 2.7. The Berkshire and South Bucks SHMA (February 2016) (CD07.15), prepared jointly by the Council and the other Authorities in Berkshire, provides an assessment of the Borough's affordable housing needs. This indicated an annual net need (2013-36) for 441 affordable dwellings (Table 81) and can be compared with the overall assessed need for 856 homes annually (Table 139). A need for 441 affordable homes annually therefore represented 51.6% of the total housing need for the Authority over the period 2013 to 2036.
- 2.8. However, the Core Strategy Policy CP5 requirement was for a minimum of 20% and 40% (and up to 50%) of dwellings delivered. As this Appeal Site lies outside of a defined development limit and is not within the boundaries of a Strategic Development Location, 40% affordable housing contribution is required.
- 2.9. Since the publication of the SHMA, the Authority has undertaken a further appraisal of affordable housing need. This is in the Local Housing Need Assessment 2019 (January 2020) (CD06.13). A further updated assessment was issued in November 2023 (CD07.17). These provide revised appraisals of affordable housing need alongside the calculation of the overall Local Housing Need figure derived from the then current version of the PPG (ID ref 2a-004-20190220).
- 2.10. The January 2020 Report indicates that over the then envisaged emerging Local Plan period for 2018-36, an annual average of 407 affordable homes would be required (paragraph 7.68), which was 51% of then minimum Local Housing Need figure of 798dpa¹.
- 2.11. The subsequent November 2023 Report indicates that over a Plan period from 2021 through to 2040, there was an overall affordable housing need for 6,689

¹ See paragraph 14 of Executive Summary (page 9).

dwellings (figure 39), which equates to 352 dwellings annually. Although the November 2023 report is the most recent assessment of affordable need, this includes allowance for first homes as part of the overall supply of affordable housing. Whilst this formed part of the portfolio of affordable tenures within the versions of the NPPF issued in 2023, it does not appear in the December 2024 version. As the appeal will be determined against the current Government guidance (consistent with NPPF paragraph 231), no further consideration will be made of the November 2023 analysis.

Affordable Housing Delivery

- 2.12. Table 1 shows that from April 2013 to March 2025, 2,900 affordable homes have been delivered in the borough. This is equivalent to an annual average rate of 241.7 affordable dwellings since 2013. This compares to the original annual requirement of 441 affordable homes and the subsequent 407 affordable homes as detailed in the 2020 Appraisal of Affordable Housing Need.
- 2.13. Alternatively, since April 2018 (the start of the period appraised in the Local Housing Need Assessment (Jan 2020)), there have been 1,880 affordable homes completed, which is nearly 970 dwellings less than that required to address its appraisal of affordable housing need (407dpa). The delivery of 1,880 affordable homes since 2018 equates to 269dpa.
- 2.14. The delivery of affordable housing whilst reaching a peak of 38% in 2023/24, nevertheless has averaged only 24% from 2013 through to 2025. The delivery has consistently been significantly below the 52% envisaged in the SHMA, the 51% of the Local Housing Need figure appraised in the January 2020 report or up to 50% through the Core Strategy policy.
- 2.15. The Council is therefore clearly significantly behind in terms of delivering the required amount of affordable housing.

Table 1: Net delivery of affordable homes in Wokingham Borough 2013-2025²

Year	Net housing completions			SHMA (Feb 2016)		LHN Rpt (Jan 2020)	
	All ³	Affordable ⁴	%	Affordable need	Difference	Affordable need	Difference
2013/14	488	108	22	441	-333		
2014/15	454	95	21	441	-346		
2015/16	675	123	18	441	-318		
2016/17	967	212	22	441	-229		
2017/18	1,528	482	32	441	41		
2018/19	1,284	365	28	441	-76	407	-42
2019/20	1,555	465	30	441	24	407	58
2020/21	1,206	187	16	441	-254	407	-220
2021/22	1,440	189	13	441	-252	407	-218
2022/23	865	121	14	441	-320	407	-286
2023/24	841	316	38	441	-125	407	-91
2024/25	647	237	37	441	-204	407	-170
Total	11,950	2,900	24	5,292	-2,392	2,849	-969

2.16. The Council's Five Year Housing Land Supply Statement for 2025-30 (July 2025) (CD06.12) does not provide information on the expected provision of affordable homes in the Borough.

2.17. As Table 3, the delivery of the delivery of 2,900 affordable dwellings since April 2013 should be viewed in the context that this represents an under provision of 2,392 dwellings as assessed by the SHMA to achieve the annual requirement of 441 affordable units. Whilst the extent of shortfall against Local Housing Need figure from 2018 is less with a deficit of 969 dwellings, this is over double its assessed annual need of 407 affordable dwellings.

² Sourced from Table 1011C at of the Government's "live tables on affordable housing supply".

³ Source: appendix 14 of the Council's Housing Land Supply Statement for 2025-2030.

⁴ Source: Table 1011C of the Government Live Tables on Affordable Housing Starts and Completions by local authority.

2.18. It is therefore evident that there is an ongoing shortfall in affordable housing delivery and that this is likely to worsen in the short term. With the expected delays in the preparation of the new Local Plan, it is not considered that the Borough's substantial need for affordable housing is likely to be resolved in the short to medium term.

Changes in the Wokingham Housing Register over Time

2.19. Alongside the very poor performance in addressing affordable housing need, it is also necessary to consider changes in the Council's Housing Register over the period since the base date of the SHMA. This further reinforces the significant unmet need for affordable homes in the Borough as indicated in the Table 2 below.

Table 2: Comparison of Housing Register Changes in Wokingham Borough⁵

	1/4/13	1/4/14	1/4/15	1/4/16	1/4/17	1/4/18	1/4/19	1/4/20	1/4/21	1/4/22	1/4/23	1/4/24 ⁶	1/4/25
Number on housing register	2,274	2,417	1,622	1,527	1,702	1,613	1,498	1,510	2,086	2,592	2,420	1,342	1,295
Those in a reasonable preference category	1,000	1,000	900	405	425	334	77	103	255	634	221	224	196
Homeless	20	20	27	65	44	20	33	45	46	43	49	80	50

2.20. Table 2 indicates the changes since 2013. This confirms that there is a significant need which continues to grow and has not been addressed by the level of affordable housing provision delivered to date in the Borough. Table 2

⁵ Data obtained from the Government – local authority housing data.

⁶ Housing Register waiting list criteria tightened. It now includes criteria of a local connection, alongside a residency test.

above also confirms that insufficient new affordable homes have been completed in the Borough to off-set the increased demand for such properties which has resulted in the size of the register remaining broadly constant. Therefore, to make an effective contribution towards addressing the requirements of households as indicated on the Borough's housing register, it is essential that further affordable homes are delivered, as envisaged on the appeal Site. Whilst Table 2 indicates that the number on the register was lower in 2024 compared to the earlier years, this will have been influenced by a tightening of the criteria for inclusion on the register to include both a residency and local connection test (whereas previously it was just a residency test).

Affordable Housing Need in Arborfield

- 2.21. Woolf Bond Planning have submitted a number of Freedom of Information Act (Fol) requests to the Council regarding the level of request for affordable housing in Arborfield & Newland Parish. The dates of these requests, and responses are shown below.

Table 3: Affordable Housing Requests in Arborfield Parish

Date of Fol response	Affordable Housing preferences for Arborfield
9 th October 2019	615
4 th February 2025	669 ⁷
6 th January 2026	789 ⁸

- 2.22. Table 3 above indicates that there are 789 requests for an affordable home in Arborfield. This compares to the 1,358 households on the borough wide register at the same date of 6th January 2026. Therefore, 58% of those on Wokingham's housing register seek an affordable home in Arborfield.
- 2.23. This indicates that there is an acute and worsening unmet demand for affordable housing in Arborfield & Newland parish.

⁷ This response also indicates the size of property sought (one bedroom – 295, two bedrooms – 145, three bedrooms – 176, four bedrooms – 45 and five bedrooms – 8).

⁸ This response also indicates the size of property sought (one bedroom – 3205, two bedrooms – 206, three bedrooms – 211, four bedrooms – 46 and five bedrooms or larger – 6).

- 2.24. This significant unmet demand can be compared with that which could be expected in the Parish. The results of the 2021 Census⁹ indicates that within the Borough, there were 177,502 people in 69,164 households. For Arborfield & Newland Parish, the 2021 Census indicates that there were 3,013 people and 1,124 households. Therefore, Arborfield & Newland Parish contains just 1.7% of the Borough's households as at the 2021 Census.
- 2.25. The results of the housing register as indicated in the Fol responses therefore emphasises that there is very significantly **greater demand** for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole. Had Arborfield & Newland parishes' need for affordable housing replicated its share of households (1.7%) then of the 1,358 households on the register as of 6th January 2026, 22 could have been expected to relate to the parish. Instead, the demand on the current waiting list (at 789) is very substantially greater than this.
- 2.26. Whilst it is acknowledged that the 789 figure includes preferences made elsewhere too, but the undeniable fact is the there is nevertheless a very strong preference/demand/need for affordable homes in this part of the Borough, especially given the demand from 669 households is nearly 36 times what could be expected on a pro-rata basis (the 22 dwellings referenced above).

Future affordable housing supply

- 2.27. The future delivery of affordable housing in Wokingham Borough is highly uncertain. In addition to the current shortfall, there is also the question of whether future needs will be met. The risks of not meeting these needs are heightened by the fact that any future housing supply delivered through permitted development conversions is exempt from affordable housing, and on brownfield sites, the affordable housing potential is tempered by vacant building credit and or viability considerations. This has the potential to make the situation even more severe, not just for Wokingham Borough's vulnerable

⁹ Population and household estimates, England and Wales: Census 2021 - Office for National Statistics (ons.gov.uk)

position on affordable housing land supply, but for the significant number of households on the Council's Housing Register on 6th January 2026 (1,358 households as detailed above).

- 2.28. If 24% of the five-year supply is affordable (as per the average shown in Table 1 between 2013 and 2025), then there is a woeful under supply of affordable homes baked into the Council's past supply compared to what is required. This reinforces the need for larger schemes that have the ability to make material contributions towards affordable housing delivery in contrast to delivery over the past 11 years.
- 2.29. Paragraph 63 of the NPPF requires that the needs of groups with specific housing requirements are addressed, which includes those requiring affordable housing.
- 2.30. Whilst the Council's five-year land supply assessment on 31st March 2024 (CD07.34) indicated that affordable homes are expected on a number of the sites listed, there is no information of the total number of such units still to be completed or their expected delivery rate. Therefore, there is no guarantee that existing permissions will provide sufficient homes to address continuing annual need for 407 affordable dwellings (assessed in the Local Housing Need Report (January 2020 – CD06.13)) together with the 1,358 households on the Housing Register.
- 2.31. The failure to meet the identified needs of affordable housing is a dire situation indicating that the Council is not fulfilling the objectives in paragraph 61 of the NPPF. The continued under-delivery of affordable housing has contributed to the worsening of the affordability ratios in the Borough as indicated in Figure 1 below.

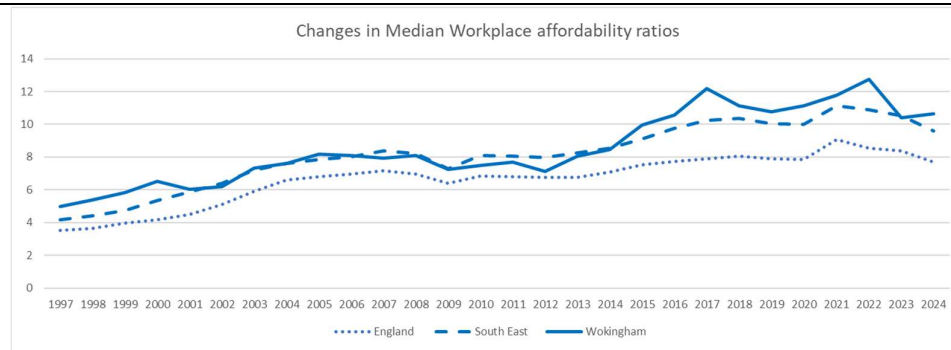


Figure 1 Changes in Median Workplace Affordability Ratios (England/South East/Wokingham)¹⁰

- 2.32. Figure 1 also shows that affordability ratios in Wokingham Borough have more than doubled between 1997 and 2024, and whilst they were below those of the South East region from 2001 to 2014, they are now back above them. This doubling in the affordability ratio has occurred because of a failure to deliver sufficient homes to meet market and affordable need in the Borough. This is illustrated by the extent that the affordability ratio of the Borough has remained above those for England and the Region. Consequently, it is essential that further increases in house building occurs to improve affordability, especially given the continual under-delivery in supply.
- 2.33. A step change in the delivery of affordable housing is therefore required if the Council is to get anywhere near the accepted identified need in the SHMA or the Local Housing Need Assessment and begin to address the dysfunctions of the local housing market. Such a step change would be consistent with the thrust of paragraph 61 of the NPPF, to boost significantly the supply of homes.
- 2.34. Furthermore, as noted in the Submission Local Plan (CD07.01 at paragraph 2.4), the population grew by 15% between 2011 and 2021 which is said to be the third highest rate of population increase in the South-East and the one of the highest in England. It is clear that the context has changed significantly from the situated existing when the Core Strategy was adopted in 2010.

¹⁰ Source: Office for National Statistics – Median Workplace Affordability Ratios as referenced in the hyperlink at Step 2 of the Method for determining Local Housing Need as set out in the “Housing and Economic Needs Assessment” section of the PPG.

2.35. Consequently, there can be no doubt that there is an acute need for affordable housing in Wokingham Borough.

3.0 Conclusion

- 3.1 Whilst the Council accept they are unable to demonstrate an adequate supply of deliverable housing land, the appellant's position is that the extent of the shortfall is greater than that accepted by the Council.
- 3.2 Furthermore, the analysis in this Annex indicates that the provision for providing the much needed affordable housing is equally dire and there remains a very substantial unmet need for such accommodation.
- 3.3 The results of the housing register as indicated in the FoI responses detailed herein emphasis that there is very significantly **greater demand** for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole.
