
**PROOF OF EVIDENCE ON FIVE
YEAR HOUSING LAND SUPPLY
AND AFFORDABLE HOUSING
NEED**

**Prepared by Mr Graham Ritchie BSc(Hons)
MA MRTPI**

**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: TBC

LPA Ref: 243099

WBP Ref: 9015

November 2025



Woolf Bond Planning
Chartered Town Planning Consultants

CONTENTS

Qualifications and Experience

- 1.0** Introduction
- 2.0** Identified Local Housing Need and 5 Year Housing Land Supply Position
- 3.0** Affordable Housing Needs
- 4.0** Conclusion

QUALIFICATIONS AND EXPERIENCE

Mr Graham Ritchie will say:

I have a Bachelor of Science and Post Graduate Diploma in Town and Country Planning and I am a Member of the Royal Town Planning Institute.

I am an Associate Director at Woolf Bond Planning Ltd – Chartered Town Planning Consultants and I have been engaged in town planning with 29 years' experience. I initially worked for a number of local planning authorities in the midlands and south-east England as both a case officer responsible for determination of planning applications and also as a policy officer drafting and implementing planning policies. I appeared in Development Plan examinations and planning appeals whilst employed in local authorities. I have also worked for a housebuilder in overseeing the promotion of their strategic land portfolio together with the submission of planning applications. Since joining Woolf Bond, I have been a private consultant acting for major house builders, development companies, estates and private individuals. This has included the submission of planning applications and appeals together with engagement in plan making (including examinations).

My involvement with this Appeal Site dates from September 2024 and since that time I have supported the wider team at Woolf Bond Planning Ltd with the scheme. I am well versed in the planning policy position especially housing land supply in Wokingham.

I have visited the Appeal Site and its surroundings on numerous occasions and I have examined the relevant plans and documents for the purpose of the appeal.

The evidence which I have prepared and provide for the appeal hearing (in this Proof of Evidence) is true and has been prepared, and is given by me, in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

1.0 Introduction

Overview

- 1.1. This Proof of Evidence been prepared by Mr Graham Ritchie in support of an appeal (“the Appeal”) by Dandara Southern Ltd and Elstree Land Ltd (“the Appellant”) against the decision of Wokingham Borough Council (“the Council”) to refuse their outline application (“the Application”). The analysis of housing need and includes contributions from Mrs Brigid Taylor MSc LLb MRTPI MIEvs PISEP.
- 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 in 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. The shortfall, in this case is significant. By the Council’s own calculation there is a deficit of some 3,461 homes in the five-year period; by my calculation this is in fact a shortfall of 3,733 homes. Either way the scale of the deficit is vast and represents a very onerous task in terms of seeking to address the shortfall. By our estimation the Council has only 2.3 years’ supply of deliverable housing sites.
- 1.4. Despite this context, the Application was refused on 20 May 2025, under delegated powers.

- 1.5. The Appellant issued a notice of an intention to submit an appeal to PINS and the Council on 10 July 2025 and the Appeal was submitted on 14 August 2025. At the point of submission, the Appellant sought that the Appeal be determined via the Inquiry procedure; the Statement of Case submitted on that date was prepared on that basis. The Planning Inspectorate have subsequently advised that the Appeal shall be determined via hearing rather than Inquiry. As a result, this Proof of Evidence, and accompanying Landscape, Highways, Arboriculture and Planning Proofs of Evidence, are now submitted setting out the Appellant's case in full. The initial Statement of Case was accompanied by a draft Statement of Common Ground ("SoCG"); the Appellant will continue to seek agreement with the Council in respect of a series of topic based SOCGs including SOCGs on the housing land supply position and affordable housing need.
- 1.6. As set in the Appellant's separate Planning Proof of Evidence, the appellant's case is that although there is a degree of conflict with the settlement boundaries established under policies CP9 and CP11 of the Core Strategy ("CS"), CC02 of the Managing Development Delivery Local Plan ("MDD") and AD1 of the Arborfield and Barkham Neighbourhood Plan ("NHP"), the weight to be attached to this conflict is limited. This is because (i) the development plan is out of date in terms of the spatial application of its housing policies; these policies are frustrating the delivery of identified housing needs and additionally, (ii) the Council is unable to demonstrate a five year supply of deliverable housing land. Either of scenarios (i) or (ii) above triggers the presumption in favour of sustainable development at paragraph 11(d) of the NPPF. In so far as there are no strong reasons for refusal at paragraph 11(d)(i) of the NPPF, the Appeal falls to be positively assessed under paragraph 11(d)(ii).
- 1.7. This Proof of Evidence sets out the appellant's position in respect of the need for market and affordable housing.

The Appeal Scheme – Housing Tenure and Mix

- 1.8. The Appeal Scheme proposed up to 111 dwellings, including 40% affordable housing (equating to up to 44 affordable dwellings and up to 67 market

dwellings). The precise housing mix would be agreed at reserved matters stage but a mix of housing type and tenures has been allowed for in the design. The 40% affordable provision meets the current policy requirement of 40% on greenfield sites of 5+ dwellings as set out in Core Strategy Policy CP5 and seeks to address the acute affordable housing need within the Borough. In accordance with the approach set out in Managing Development Delivery Local Plan Policy TB05 and the Council's Affordable Housing Supplementary Planning Document, the affordable housing component of the scheme (44 dwellings; 40%) is expected to comprise the following mix, which can be agreed and secured through the s106 agreement:

- 8 x 1-bed dwellings
- 21 x 2-bed dwellings
- 9 x 3-bed dwellings
- 6 x 4-bed dwellings

The Development Plan

- 1.9. Relevant Development Plan policies include:
- Core Strategy CP5 – Housing Mix, Density and Affordability
 - Core Strategy CP17 – Housing Delivery
 - Managing Development Delivery DPD Policy TB05 – Housing Mix

Housing Land Supply Position - Overview

- 1.10. Whilst the Council accepts they are unable to demonstrate an adequate supply of deliverable housing land, (and that there remains an acute need for affordable housing) the Appellants position is that the extent of the shortfall is greater than that accepted by WBC. Their latest position statement (August 2025) concluded that there is a deliverable housing land supply of only 2.5 years during the period April 2025 to March 2030. The Appellant's position is that it is a maximum of 2.3 years.
- 1.11. The Council suggests that there Local Housing Need is current 1,316 dwellings annually although in applying the formula specified in the PPG the Appellant

calculates it to be 1,317 dwellings annually¹. With the inclusion of the 5% buffer, this results in a five year target for 6,914 dwellings (1,382.8 annually). This is marginally above that advanced by the Council.

- 1.12. Although the Council suggests that its deliverable supply is 3,453 dwellings resulting in a five year provision of 2.5 years, the Appellants disputes the expected contribution from three sites. In general, this is because the Appellant is applying the stated approach of the Council in the highlighted text in their latest Housing Land Supply Statement on both benchmark lead-in times (page 17) and build-out rates (page 21). The reasons for the Appellants approach is explained in detail later in this Proof of Evidence and this also explains the adjustments to the three sites where deliverability is disputed.
- 1.13. The Appellant therefore reduces the expected supply by 272 dwellings from 3,453 dwellings to 3,181 dwellings. This reduces the supply to 2.3 years,
- 1.14. The Table below provides the comparison of the conclusions of the Council and Appellant with respect to housing land supply.

Table 1: Housing Land Supply Position - Comparison		
Step	LPA	WBP
A - Annual requirement (1/4/25 – 31/3/30)	1,317	1,317
B - Base year Requirement: (1/4/25 – 31/3/30) (A x 5)	6,585	6,585
C - Add 5% buffer pursuant to HDT (B x 5%)	329	329
D – Final five year requirement (1/4/25-31/3/30) (B + C)	6,914	6,914
E - Annual requirement (1/4/25 – 31/3/30) (F/5)	1,382.8	1,382.8
F – Deliverable supply (1/4/25 – 31/3/30)	3,453	3,181
G - No. Years Supply (F/E)	2.50	2.30

¹ The difference in LHN is a result of a miss calculation of the Adjustment factor as shown in Appendix 1 of the Housing Land Supply Assessment published in August 2025. Whilst it is accepted that the 5 year average of median workplace affordability ratios is 11.34, applying the methodology is the PPG results in an adjustment factor of 2.2046 rather than 2.2039 as specified. Applying the correct adjustment factor results in a LHN of 1,317dpa.

H - Extent of Surplus / Shortfall compared to 5 year requirement (F – D)	-3,461	-3,733
--	---------------	---------------

- 1.15. As indicated in Table 1, the Council can demonstrate a maximum of 2.5 years which results in a deficit of 3,461 dwellings. In contrast, the Appellant assesses the land supply is 2.3 years which results in a shortfall of 3,733 dwellings.
- 1.16. The Appellant shall seek to agree a Housing Land Supply Statement of Common Ground with the Council.

2.0 Identified Local Housing Need and 5 Year Housing Land Supply Position

Overview

- 2.1. The Council accepts that they cannot demonstrate the necessary five-year supply of housing land; they have prepared an updated land supply assessment, for the period April 2025 to March 2030, to show 2.5 years' supply (compared to the 1.7 years they considered was available between April 2024 and March 2029).
- 2.2. The Appellants position is that the extent of the shortfall is greater than that accepted by WBC, with a maximum of 2.3 years' supply.
- 2.3. The Council suggests that their Local Housing Need figure ("LHN") is currently 1,316 dwellings annually although in applying the formula specified in the Planning Practice Guidance ("PPG") the Appellant calculates this figure to be 1,317 dwellings annually². With the inclusion of the necessary 5% buffer, this results in a five year requirement for 6,914 dwellings (1,382.8 annually).
- 2.4. Although the Council suggests that its deliverable supply is 3,453 dwellings resulting in a five year provision of 2.5 years, the Appellant disputes the expected contribution from three sites in particular based upon benchmark lead-in times and build-out rates (as per the Council's own stated approach in their Housing Land Supply Statement at pages 17 and 21 respectively, in the highlighted text).

Deliverability of Sources of Supply - Guidance

- 2.5. In assessing the robustness of the Council's delivery assumptions, it is also appropriate to take account of the guidance in the NPPF, the accompanying PPG and the conclusions of Inspectors on these matters in relevant planning appeals

² The difference in LHN is a result of a miss calculation of the Adjustment factor as shown in Appendix 1 of the Housing Land Supply Assessment published in August 2025. Whilst it is accepted that the 5 year average of median workplace affordability ratios is 11.34, applying the methodology in the PPG results in an adjustment factor of 2.2046 rather than 2.2039 as specified. Applying the correct adjustment factor results in a LHN of 1,317dpa.

2.6. Primarily, the NPPF “Glossary” defines “Deliverable” as follows:

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

2.7. With respect to the second category of sites, the PPG on “Housing supply and delivery”, states under the heading “What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking”? ³

“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;*
- are allocated in a development plan;*
- have a grant of permission in principle; or*
- are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*

³ ID ref 68-007-20190722

-
- *firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
 - *firm progress with site assessment work; or*
 - *clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.”

2.8. Whilst the difference in the NPPF’s definition of ‘deliverable’ site has changed over time, it is also important to emphasise the nature and scope of evidence necessary to allow for inclusion of sites, especially where they are outside of “Category A”. This is pertinent to the consideration of Wokingham Borough’s housing supply, as detailed below, especially given the onus is upon the Local Authority to demonstrate deliverability for sites outside of Category A. In short, in the absence of **clear** evidence, it is only category A sites that a Council can rely upon as ‘deliverable’ sites for the purposes of housing land supply calculations. As the NPPF’s Glossary definition of deliverable sites within Category A, there can be circumstances where even sites in this group of sources are considered undeliverable for the purpose of 5 year housing land supply⁴.

2.9. In this context, reference is specifically made to the need to consider “long term phasing plans” and the implications of this for overall delivery. In the context of phasing plans, a number of appeal decisions emphasise the need to sense check the assumptions and expectations detailed. These include decisions for land at Park Lane, Charvil (allowed 2nd March 2017)⁵, on land east of Butts Road, Ottery St Mary (allowed 14th December 2012)⁶ and on land west of Park Farm, Thornbury, South Gloucestershire (allowed 11th February 2023)⁷.

⁴ The text in brackets – they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans

⁵ PINS ref APP/X0360/W/15/3130829

⁶ PINS ref APP/U1105/A/12/2180060

⁷ PINS ref APP/P0119/W/21/3288109

- 2.10. The appeal decision for Park Farm, Thornbury is of particularly relevance to the consideration of a Category A site and the reasonableness of the delivery rate assumptions (paragraphs 81 and 82). In that case, the expected delivery was reduced from 1,487 dwellings to 955 dwellings (reduction of 523 dwellings as per paragraph 82 of the decision). This equated to 191 dwellings annually, or the highest rate achieved historically on the site (as referenced in paragraph 81 of the decision).
- 2.11. The reasonableness of expected delivery rates whilst relevant to phasing plans as indicated in Category A also applies to the consideration of the assumptions for construction on Category B sites.
- 2.12. Along with delivery rates, the nature and quality of evidence to substantiate expected delivery from Category B sites have been considered in a number of landmark appeal decisions as summarised below

Appeal Decision at Little Sparrows, Sonning Common

- 2.13. One landmark appeal regarding the nature and quality of evidence required to evidence deliverability forms a scheme at Little Sparrows, Sonning Common, Oxfordshire allowed on 25th June 2021.
- 2.14. The Inspector's review of the type of evidence needed is contained at paragraphs 20 and 21 of the decision

I have also had regard to the PPG advice published on 22 July 2019 on 'Housing supply and delivery' including the section that provides guidance on 'What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking.' The PPG is clear on what is required:

"In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions."

This advice indicates to me the expectation that 'clear evidence' must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.

Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are there planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed. Securing an email or completed pro-forma from a developer or agent does not in itself constitute 'clear evidence'. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward.

Appeal Decision for land off Colchester Road, at Bures Hamlet, Essex⁸

- 2.15. At paragraphs 66 to 67 of the Bures Hamlet appeal decision (dismissed 27th March 2019), the Inspector found.

"Where there is to be a reliance on an annual assessment then that clear evidence should logically be included in that published assessment or at least published alongside it. That would qualify as publicly available in an accessible format as the PPG requires. It would accord with guidance in PPG Paragraph 3-048 which applies to all forms of annual review including, but not limited to, annual position statements. That is not to say there should be publication of every email or every note of a meeting or telephone conversation. The information can be provided in summary form but there needs to be some means of identifying the basis for the conclusion reached.

The information published here in the AMR is minimal and it relies heavily on unsupported assertions that a site will be delivered. That does not amount to clear evidence. In most cases it does not include the additional information that was introduced only in oral evidence at the inquiry such as: the date when a reserved matters submission was made or anticipated; when a S106 obligation was completed; why a full planning application and not a reserved matters application was submitted on a site that already had outline permission; the source of an estimate of a delivery rate; any assumptions and yardsticks that were applied where direct information was in doubt or missing; or other information of the type suggested in PPG paragraph 3-036."

Appeal Decision at Land at Caddywell Lane/ Burwood Lane, Torrington, Devon⁹

⁸ APP/Z1510/W/18/3207509

⁹ Ref. APP/W1145/W/19/3238460

- 2.16. Paragraph 56 of the Torrington Inspector's decision (allowed 18th March 2020) commented on what is required by the PPG when assessing a Category B site and states:

This indicates the expectation that 'clear evidence' must be something cogent, as opposed to simply mere assertions. There must be strong evidence that a given site will in reality deliver housing in the timescale and in the numbers contended by the party concerned.

- 2.17. These decisions reinforce the importance of clear evidence to support the asserted deliverability of sites/sources within the supply. Therefore, having regard to these appeal decisions, for any site not included within the first category of sources detailed in the NPPF Glossary, it is essential that this is substantiated by the necessary "clear" evidence of "deliverability", as outlined in the PPG¹⁰.
- 2.18. Taking account of the guidance in the NPPF and the conclusions of appeal Inspectors, specific sites and sources where the contended delivery is not justified must be omitted from an HLS. Especially given "clear evidence" must be something cogent, as opposed to simply mere assertion. We have reviewed the sites within the land supply assessment (both Category A & B) to establish the realism of expected delivery rates and lead in times (as applicable) to determine whether the Council's assumptions are realistic. It is within this context that the Council's HLS position is reviewed below.

Assessment of Wokingham Sources of Supply

- 2.19. For each of the three sites which the Appellant disputes the expected lead in times and delivery rates have been assessed using the benchmark rates detailed on pages 17 and 21 (respectively) of the Council's Housing Land Supply Statement (August 2025). Consistent with the conclusions of the aforementioned appeal Inspectors, in the absence of clear evidence to the contrary, especially taking account of the clear conclusions of Inspector in the Charvil and Ottery St Mary appeals, it is essential to sense check the

¹⁰ See Housing Supply and Delivery section (ID 68-007-20190722)

expectations. The Appellants application of the Council's own evidence on these matters for these three sites therefore accords with this advice.

Disputed Site 1: Parcel R10, land at phase 2b of South Wokingham SDL.
Reduction of 53 dwellings

- 2.20. For Parcel R10, the reserved matters application by Miller Homes for 215 dwellings (250399) was approved on 23rd June 2025. Allowing the average 18 months from reserved matters approval to first house sale means that the initial completion on the site would be at the start of 2027. Thereafter, given the site is part of the wider S Wokingham SDL, output of 50dpa is feasible. The difference in delivery forecasts from this site during the five years is therefore shown below.

Year	2025/26	2026/27	2027/28	2028/29	2029/30	total
LPA	0	20	65	65	65	215
WBP	0	12	50	50	50	162

Disputed Site 2: Parcel R11, land at Phase 2b of South Wokingham SDL.
Reduction of 181 dwellings

- 2.21. For Parcel R11, the reserved matters application by Kier Developments for 343 dwellings (250678) was approved on 23rd September 2025. Allowing the average 16 months from reserved matters approval to first house sale means that the initial completion on the site would again be at the start of 2027. Thereafter, given the site is part of the wider S Wokingham SDL, output of 50dpa is feasible. The difference in delivery forecasts from this site during the five years is therefore shown below.

Year	2025/26	2026/27	2027/28	2028/29	2029/30	total
LPA	0	97	78	112	56	343
WBP	0	12	50	50	50	162

Disputed Site 3: Land at Bridge Farm, Bath Road, Twyford. Reduction of 38 dwellings

- 2.22. For the land at Bridge Farm, the reserved matters application by Croudace Homes for 200 dwellings (243124) was approved on 19th June 2025. Allowing the average 18 months from reserved matters approval to first house sale means that the initial completion on the site would be at the start of 2027.

Thereafter, given the site is opposite the David Wilson/Barratt development site, output of 50dpa is feasible. The difference in delivery forecasts from this site during the five years is therefore shown below.

Year	2025/26	2026/27	2027/28	2028/29	2029/30	total
LPA	0	30	55	55	60	200
WBP	0	12	50	50	50	162

- 2.23. On that basis, it is considered appropriate to reduce the expected supply from these three sites by 272 dwellings resulting in a maximum of 3,181 dwellings' supply. This therefore equates to 2.3 years' housing land supply.
- 2.24. Table 2 below provides the comparison of the conclusions of the Council and Appellant with respect to housing land supply.

Table 2: Housing Land Supply Position - Comparison		
Step	LPA	WBP
A - Annual requirement (1/4/25 – 31/3/30)	1,317	1,317
B - Base year Requirement: (1/4/25 – 31/3/30) (A x 5)	6,585	6,585
C - Add 5% buffer pursuant to HDT (B x 5%)	329	329
D – Final five year requirement (1/4/25-31/3/30) (B + C)	6,914	6,914
E - Annual requirement (1/4/25 – 31/3/30) (F/5)	1,382.8	1,382.8
F – Deliverable supply (1/4/25 – 31/3/30)	3,453	3,181
G - No. Years Supply (F/E)	2.50	2.30
H - Extent of Surplus / Shortfall compared to 5 year requirement (F – D)	-3,461	-3,733

- 2.25. As indicated in Table 2, the Council asserts it can demonstrate a maximum of 2.5 years' which results in a deficit of 3,461 dwellings. In contrast, the Appellant assesses the land supply at 2.3 years' which results in a shortfall of 3,733 dwellings.

- 2.26. The appellant will seek to agree a Housing Land Supply Statement of Common Ground with the Council, in order to narrow the issues between the parties and seek to save time and resources at the inquiry.

3.0 Affordable Housing Needs

Overview

- 3.1. 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.
- 3.2. The Affordable Housing SOCG agreed between the Council and another applicant in the Blagrove Lane appeal (dated 27 February 2025) makes clear that a number of matters related to affordable housing need were not agreed between the parties. The appellant therefore sets out below their position on the extent of affordable housing need in Wokingham, and Arborfield specifically. This detail is provided to allow for early discussions with the Council in order to agree the terms of an Affordable Housing SoCG and seek to narrow the issues and time required at the forthcoming hearing.

Affordable Housing – Policy and Guidance

- 3.3. 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).
- 3.4. 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.
- 3.5. The NPPF sets a strong emphasis on the delivery of sustainable development, including affordable homes, at paragraphs 20 and 63.
- 3.6. 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).

3.7. 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.
- Written Ministerial Statement made by the Minister of State for Housing and Planning on 12 December 2024 (Publication of new NPPF).
- Statements by the Chancellor associated with the publication of the National Infrastructure Strategy (19th June 2025)

Evidence of Affordable Housing Need

3.8. The Berkshire and South Bucks SHMA (February 2016), 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. 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.

3.9. 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). A further updated assessment was issued in November 2023. 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).

3.10. 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 798dpa¹¹.

- 3.11. 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 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

- 3.12. As indicated in the Table 3 below the Council has delivered 2,663 affordable homes in the period April 2013 to March 2024. This is equivalent to an annual average rate of 242.1 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. It is therefore clear the development plan and the Council is significantly behind in terms of delivering the required amount of affordable housing.

¹¹ See paragraph 14 of Executive Summary (page 9).

Table 3: Net delivery of affordable homes in Wokingham Borough 2013-2024¹²							
Year	Net housing completions			SHMA (Feb 2016)		LHN Rpt (Jan 2020)	
	All¹³	Affordable¹⁴	%	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
Total	11,303	2,663	24	4,851	-2,188	2,442	-799

3.13. Alternatively, since April 2018 (the start of the period appraised in the Local Housing Need Assessment (Jan 2020)), there have been 1,643 affordable homes completed, which is nearly 800 dwellings less than that required to address its appraisal of affordable housing need (407dpa).

3.14. The delivery of affordable housing whilst reaching a peak of 38% in 2023/24, nevertheless has averaged only 24% from 2013 through to 2024. 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.

¹² Sourced from Table 1011C at of the Government's "live tables on affordable housing supply".

¹³ Source: appendix 14 of the Council's Housing Land Supply Statement for 2024-2029.

¹⁴ Source: Table 1011C of the Government Live Tables on Affordable Housing Starts and Completions by local authority.

-
- 3.15. As Table 3, the delivery of 2,663 affordable dwellings since April 2013 should be viewed in the context that this represents an under provision of 2,188 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 799 dwellings, this is nearly double its assessed annual need of 407 affordable dwellings.
- 3.16. Alongside the acknowledged shortfall in housing supply, the Council does not have any evidence which demonstrates that the worsening position, with respect to affordable housing delivery, will also be addressed.
- 3.17. 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 Woking Housing Register over Time

- 3.18. 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 4 below

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

3.19. Table 4 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 3 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 4 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

3.20. Woolf Bond Planning submitted a number of Freedom of Information Act (Fol) requests to the Council regarding the level of request for affordable housing in

¹⁵ Data obtained from the Government – local authority housing data.

¹⁶ Housing Register waiting list criteria tightened. It now includes criteria of a local connection, alongside a residency test.

Arborfield & Newland Parish. The dates of these requests, and responses are shown below.

Table 5: 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 ¹⁷

- 3.21. Table 5 above indicates that there are 669 requests for an affordable home in Arborfield. This compares to the 1,204 households on the borough wide register at the same date of 4th February 2025. Therefore, 55% of those on Wokingham's housing register seek an affordable home in Arborfield.
- 3.22. This indicates that there is significant unmet and growing demand for affordable housing in Arborfield & Newland parish.
- 3.23. This significant unmet demand can be compared with that which could be expected in the Parish. The results of the 2021 Census¹⁸ 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.
- 3.24. 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 1,204 households on the register as of 4th February 2025, 20 could have been expected to relate to the parish.

¹⁷ 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).

¹⁸ Population and household estimates, England and Wales: Census 2021 - Office for National Statistics (ons.gov.uk)

Instead, the demand on the current waiting list (at 669) is substantially greater than this. It is acknowledged that the 669 figure includes preferences made elsewhere too, but the undeniable fact is there is nevertheless a strong preference/demand/need for affordable homes in this part of the Borough, especially given the demand from 669 households is over 33 times what could be expected on a pro-rata basis (the 20 dwellings referenced above).

Future affordable housing supply

- 3.25. 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 position on affordable housing land supply, but for the significant number of households on the Council's Housing Register on 4th February 2025 (1,204 households as detailed above).
- 3.26. If 24% of the five-year supply is affordable (as per the average shown in Table 3 between 2013 and 2024), 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.
- 3.27. Paragraph 63 of the NPPF requires that the needs of groups with specific housing requirements are addressed, which includes those requiring affordable housing. Whilst the Council's five-year land supply assessment on 31st March 2024 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)) together with the 1,204 households on the Housing Register.

- 3.28. 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.

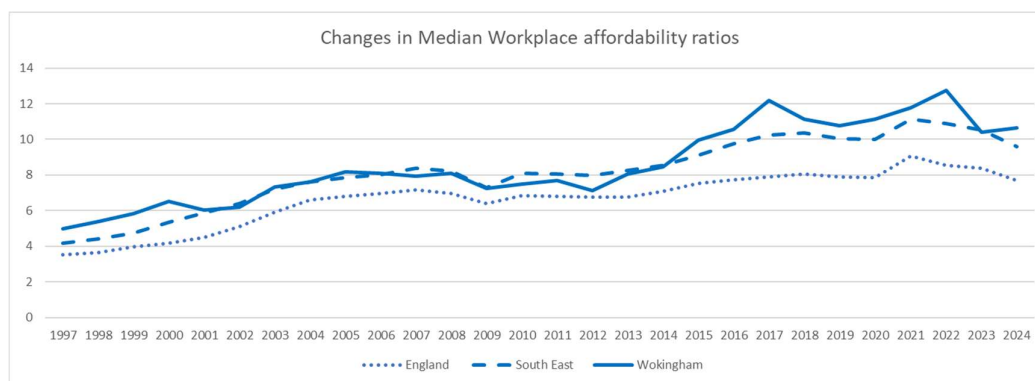


Figure 1 Changes in Median Workplace Affordability Ratios (England/South East/Wokingham)¹⁹

- 3.29. 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.
- 3.30. 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

¹⁹ 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.

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.

- 3.31. Furthermore, as noted in the Submission Local Plan (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 situation existing when the Core Strategy was adopted in 2010.
- 3.32. Consequently, there can be no doubt that there is an acute need for affordable housing in Wokingham Borough.

Conclusion

- 3.33. To conclude, whilst the Council accepts they are unable to demonstrate an adequate supply of deliverable housing land, (and that there remains an acute need for affordable housing) the Appellants position is that the extent of the shortfall is greater than that accepted by WBC. Their latest position statement (August 2025) concluded that there is a deliverable housing land supply of only 2.5 years during the period April 2025 to March 2030. The Appellant's position is that it is a maximum of 2.3 years. The difference in position derives from the deliverability of three sites included within the housing supply.
- 3.34. The analysis in this Proof also demonstrates that there is substantial unmet need for affordable housing in Wokingham. The results of the housing register as indicated in the Fol responses detailed herein emphasise that there is very significantly **greater demand** for affordable homes in Arborfield & Newland Parish compared to the Borough as a whole.