

CAMPAIGN FOR FAIRER HOUSING REG 19 CONSULTATION SUBMISSION (REVISED)

1. Delivery plan

The application delivery schedule for infrastructure at Loddon Garden Village (LGV) is unrealistic and unsupported by enforceable mechanisms. Houses are scheduled for 2027/8, but even if the plan is adopted in 2026, there would be insufficient time for infrastructure to be provided before construction, as required. Without clear mechanisms to guarantee this delivery, the ambitious 2,800-home target by 2039/40 looks very difficult to attain.

2. Traffic

The traffic impact of the LGV development is a significant issue for local residents who have already experienced traffic congestion issues from previous developments in Lower Earley, Winnersh, Shinfield, and Arborfield. It is vital that there is confidence from the wider public in the traffic projections and the solutions proposed by the applicant.

3. Schools

WBC spent over £40 million on the construction of the original buildings at Bohunt School. And a further £6-10 million on additional sixth form capacity, bringing the total to £46-50 million. By 2037, the cost of building a secondary school may exceed £100 million, considering inflation over the next 11 years. Has WBC ensured that RoU will fund this additional cost, or will the school be reduced in size to fit RoU's current budget?

4. Public health

The existing shortage of medical services in the Shinfield/Arborfield areas would be made significantly worse by the LP proposals. Patient numbers per GP in these areas, on NHS figures, already far exceed the national average. If new homes were dispersed throughout Wokingham Borough, this would reduce the pressure on health services. There are currently no credible plans to meet the future health needs of this development. Experiences in Shinfield and Arborfield show the urgent need to implement new health solutions as a priority at the start of the development. This will meet the new demand and deliver additional capacity in an already overstretched area. This application, as proposed, will only make things worse.

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5. Wastewater treatment

The application does not take proper account of increased clean and wastewater requirements resulting from adding over 10,000 individuals to an already well-populated area. As regards wastewater, the sustainability appraisal report produced by AE COM (p. 140) notes specific concerns raised in Wokingham Borough Council's 2023 Water Cycle Study (WCS), which the LP does not address satisfactorily. Two WwTWs in the area are expected to exceed their flow capacity and would require upgrades. The LGV would impose a large extra load on one of them, the Arborfield Wastewater Treatment Works, which the developments planned at Barkham Square and Blagrove would have further impact on. We note the latter is already struggling, with five sewage outflows reported by Thames Water in the last two months. The WCS found that the Ashridge WwTW has headroom to cope with more population, yet the LPU excludes development at Ashridge Manor. We find that anomalous, and a good sustainability argument in favour of preferring the development of the Ashridge site.

6. Sustainability

The application site is the most unsustainable site on offer compared to Twyford and Ashridge, since it is surrounded by roads already congested with traffic, a river which floods regularly, and the Loddon river and M4 requiring very expensive engineering solutions to create north-south traffic access to the Lower Earley road network. The LPU's comparative assessment between sites is inconsistent, which compounds the concerns of sustainability.

7. More on deliverability

: This application continues previous dependency on large sites, which have caused significant issues with overall deliverability and compliance with 5-year land supply rules since 2015. This has been aggravated by repeated renegotiation with the large site applicants who could not or would not just get on with delivering the LPU numbers on their sites, but continued to seek changes, often at appeal to the plans outlined in the LPU. This application does nothing to address these issues, and its size and % of the overall numbers is likely to compound deliverability issues, resulting in delays and planning by appeal from unassessed sites.

8. Social Housing/Affordability/Tenant Mix

The affordability and ownership structure currently set out is undeliverable. Speaking to social housing professionals, a 40% social housing mix is uncommercial and will never be built. Developers will agree to any conditions to obtain planning permission

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and then come back claiming affordability issues to change the mix of housing. This is dishonest to the current local community. Additionally, there is currently a shortage of Housing Associations prepared to bid to build the social housing component on sites like LGV. All this should make this application unsound.

9. Politicisation of the LPU Process and RoU's application

All planning applications have a political component, and this application is no exception. However, there seems to be an undue "Anywhere but Twyford" element to this application. Its appearance before the EIP has even started, let alone been completed and WBC finalising the Local Plan, raises concerns as to proper process. Three out of the last four leaders of the Council, going back to 2016, have represented the Northern Parishes, and all major applications have been in the south and west of WBC. We started with a plan for 15,000 houses in Grazeley despite the AWE Burghfield statutory evacuation zone initially covering part of the site and subsequently covering the entire site. Now we have LGV, which of the three sites considered is the least "sustainable" site since it is the most reliant on the private car, the most problematic accessing the wider transport network, has the most heavily surrounding congested roads, and has the most expensive internal infrastructure costs. We are concerned that this application site has been encouraged due to it not being close to Twyford.

10. Financial viability

We have concerns that there are further issues with the financial viability of this application, which are not being properly addressed. This application reduces the capacity of Lower Earley Way and reduces the capacity of the bridge over the M4 compared to the LPU. It is claimed that RoU's traffic modelling shows that this additional capacity is unnecessary. An alternative interpretation is that the cost of these two highway projects is so expensive that RoU wants to reduce their costs to save money, and that changes to traffic modelling assumptions are changes to support this outcome, notwithstanding that the reduced traffic levels are unlikely in practice to materialise. Has any financial sensitivity analysis been undertaken on this project? There are some very large ticket items, which, if the assumptions and costing are materially inaccurate, could land WBC with costs running into tens of millions of £. Does WBC have the financial capacity to step in and bail RoU out in the future?