

CAMPAIGN FOR FAIRER HOUSING OBJECTIONS

The planning application submitted by the University of Reading, for Loddon Garden Village (LGV) ROU number 252498, deviates from the Local Plan Update (LPU) approved by Wokingham Borough Council (WBC). This application was included in discussions at the Examination in Public (EIP) in response to some of the issues the Planning Inspectors raised in their letter regarding matters for discussion. We are confused as to the status of this application since, among other things, it changes the highway improvement requirements set out in the LPU, which were required to meet the expected additional traffic generated from this development. What is the status of the changes proposed in the application, which have not been approved by Wokingham Borough Council? Has the council already accepted these changes? If not, what is the process by which they might be changed?

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.

The current Local Plan 2006-26 (LP) suffers from insufficient timely delivery, leading to continuing issues with the 5-year land supply and planning by appeal. There is nothing in this application that will enable the council to meet its 5-year land supply responsibilities from 2027/28 to 2032/33. Experience in Shinfield is that the commencement of delivery is likely to suffer delays due to the complexity of this application. Also, based on previous experience in Shinfield, there will be post-approval arguments on changes to housing numbers, social housing mix, and infrastructure projects. These discussions will add to the time delay before RoU starts actual development.

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.

The Council's own figures show that between 2019 and 2023, a nearly 25% increase in private vehicle flow was recorded at the census point near the Black Boy (Shinfield) roundabout complex. This location is where much of the traffic to and from the LGV would converge. Considerable traffic congestion here and on Lower Earley Way is very familiar already to local residents, even without the LGV.

The application cannot avoid admitting that a large development caused by the LGV would have a significant effect on traffic volumes, but it does not explain this clearly.

In the Transport Assessment, we expected to see a table showing current traffic near LGV and then what the traffic would be following LGV's completion. This table does not seem to be included. The possible effect of traffic from the new site on nearby roads is not clearly shown in the document. Later, in the Transport Assessment, we are told that traffic on the A327 and Lower Earley Way will go up by 20 to 25%, but:

- a) the reasons for these numbers are not easy to find at that point in the document, and
- b) the effects on local traffic are not shown in the section about the LGV itself.

There needs to be a proper assessment of how traffic would be impacted by policy SS13, based on current numbers and realistic assumptions. We think that the examination in the public (EIP) inspector's letter in December 2025 asked WBC to provide this information, so that they can consider it at Phase 2 of the EIP.

Details on the outline planning application: While model verification is available in Appendix 7.3 of the outline planning application, traffic modelling may severely underestimate the amount of traffic, using pre-pandemic data and making unrealistic baseline assumptions about public transport use. Could real-life data be collected at key traffic points instead? Would these real-life data then negate the value of the traffic model? Traffic models are beset with several key issues:

- (a) the lack of consistency among macroscopic models.
- (b) the lack of flexibility.
- (c) the lack of capability to forecast the near future, and
- (d) the lack of expandability beyond one-dimensional traffic.

Matters of detail on traffic:

- (a) It is proposed to provide a fourth traffic lane around the Black Boy roundabout. The roundabout complex was originally built mainly with four circulatory lanes but was reduced to three following safety concerns. The difficulties, however, lie not in the junction itself, but in exit capacity issues West towards J11, North towards Reading, and East towards Lower Earley. A fourth lane on the roundabout would not address these issues. Nor is it clear as to why it is now considered safe to have four lanes on the roundabout, whereas in 2015 it was not safe. The provision of additional capacity on the roads leading up to the Back Boy roundabout would help manage additional traffic. Why have these not been proposed as part of this application or part of the LPU?
- (b) §4.2.5 lumps all the LPU sites together and states that the entire LPU is modelled in the area of interest relative to a background growth of 10,000 vehicles. LGV alone, with almost 4,000 houses, three schools, and 100,000 sq m of new R&D facilities, may well generate traffic volumes more than this. Vehicle ownership figures in the surrounding area are currently around 1.7 per

household, so on that basis, nearly 7,000 vehicles out of that background growth would be contributed by housing at LGV alone, not to speak of vehicle ownership growth on other sites in the plan, and traffic movements to the proposed and existing businesses. Has the revised modelling undertaken by RoU considered these traffic numbers, or have they been reduced by assumptions of the number of residents using other forms of transport to the private car, which may be unrealistic in practice, but support claims in the application to reduce the capacity on Lower Earley Way and on the bridge over the M4? Has the sensitivity of these assumptions been modelled? If so, what is the outcome, and if not, why not?

(c) The proposed M4 bridge would not be built until Phase 3 of the LGV project. The TA has essentially ignored the phasing aspect, so no modelling is reported of traffic flow in Phases 1 and 2, compared with Phase 3. The phasing and lack of detail in the plan mean that issues cannot be judged satisfactorily. What is the likelihood that the cost of the M4 bridge will increase significantly by the start of Phase 3, and that RoU may claim that they cannot afford to finance the bridge's construction? Has there been a sensitivity analysis of the cost of infrastructure? How much would these costs have to rise before the application becomes financially unviable?

Inspectors expressed "particular concerns about the delivery of housing" in relation to crucial infrastructure. They questioned when "critical" or "essential" projects—such as a bridge over the M4 and a bridge over the River Loddon—would be delivered, specifically asking if they would be completed before residents moved into the new homes.

Details on the outline planning application:

While detailed plans are provided for the M4 bridge and River Loddon bridge within the outline planning application, no visible timelines are provided for the erection of this infrastructure, particularly in relation to the LGV Planning Statement published in September 2025.

Currently, the outline planning application offers no visible assurances as to when these structures might be built in relation to the new houses. Notably, the M4 bridge and connecting roads, according to Appendix 3.1 M4 Motorway Crossing v1 of the outline planning application, show only a two-lane carriageway (one for each direction of traffic). Would this address the expected increase in traffic from 2,800 homes?

We are concerned that the traffic modelling is overly optimistic, lacks credibility with the public and is likely to significantly underestimate the actual number of car movements that are generated from this development. Such underestimating may, in the short term, support the approval of this application. However, the underestimation may cause WBC to have to spend many tens of millions of £s in the future to implement improvements to cope with the actual higher traffic volumes. These higher volumes could have been predicted at the application stage, but appear to have been dismissed due to potentially overly optimistic traffic modelling

assumptions. Such errors in the current modelling will likely, in practice, make traffic congestion worse, not better.

3. Schools

The secondary school provision in the plan appears neither adequate nor timely. The only new secondary school in the LP would be completed in 2037, some 10 years after the first home completions, and at a point when the bulk of the site would have been built out. Hundreds of secondary-age children would, before that time, be living on the site, with no additional school provision. We also note that Wokingham Borough Council's education report of 2023 highlights the critical lack of school places already in the Shinfield/Arborfield area. Thus, there may well not be provision for these children elsewhere in the borough.

The delays in bringing the schooling forward, especially the secondary school provision, could significantly impact WBC's spending on home-to-school transport operations and increase the budget significantly. We understand that this budget is already overspending significantly.

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.

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.

Statement from Inspector: The SoCG indicates that the Environment Agency has outstanding concerns regarding the delivery of capacity improvements to the Arborfield Sewage Treatment Works. Thames Water and the IDP indicate that improvements will be delivered between 2025 and 2030. Have these improvements been secured? Please provide any relevant documentation which sets this out.

Details on the recent outline planning application:

- (a) While asset location maps appear to be present within the report, no such details on the delivery of capacity improvements are present.
- (b) Notably, Thames Water is currently £16.7 billion in debt.
- (c) It remains a serious point as to how Thames Water could deliver these improvements between 2025/30 while being considerably in debt.

In conclusion, the water supply and wastewater treatment plans in this application are overly optimistic, uncosted and reliant on an insolvent supplier. If clear, costed and deliverable plans are not forthcoming from RoU and Thames Water, then the soundness of this application is somewhere between questionable and unbelievable, which would normally put the whole application at risk of rejection.

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

In the 1991 to 2006 Local Plan, the major development at Grazeley of 2,500 houses was rejected, and the houses were distributed around the Borough. As a result, we did not encounter any major issues with deliverability. In the 2006 to 2026 Local Plan, we had to incorporate the Southeast Plan of 2003, which included two large sites at Shinfield and Arborfield Garrison. To these were added large sites at North Wokingham and South Wokingham. All these large sites were late in delivery, with South Wokingham yet to start, even though it was due to be completed by 2026. We have had continual problems with achieving a 5-year land supply and had to accept

a significant number of houses approved at appeal. The number of houses required in each plan has increased with every Local Plan period since 1991. The selection of LGV to deliver such a large percentage of the total number of risks repeats the problems of such dependency on large sites from the last plan between 2006 and 2026.

The LPU includes an estimate of 125 houses per annum from the start of building until 2030. This would leave us very short on delivery from this site to meet our target and open sites coming forward through “planning on appeal,” which negates the whole principle of Local Plans assessing and balancing the proposed sites and their impact. If the delivery of this site is so backended, then does this mean that the LPU is unsound?

The history of the large sites since 2006 has been one of late delivery, both of houses and infrastructure. The Southern part of Arborfield Garrison (now known as Arborfield Green) was delayed significantly due to negotiations with the developer and the Council. South Wokingham has yet to start due to problems assembling the land and finding a developer. Even West of Shinfield was delivered late due to Reading University going to appeal to increase the numbers. Our history of dependency on large sites has led to late delivery.

The principle of needing to adhere to and deliver to a “5-year land supply” adds another complication to the mix. The council is already below the 5-year land supply target, which has been made worse by the Government refusing to count the 2,000 houses over-supply against our numbers a few years ago. The approval of this site would not solve the Council’s 5-year land supply issues and would make them even worse. If there is a need to achieve a 5-year land supply, then this LPU would probably make this worse.

In Conclusion: 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 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.

Therefore, it is likely that the 40% social housing mix will need to be revised following approval on deliverability and financial grounds, which should be negotiated in the open as part of this application, not later behind closed doors.

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.

Comment from EIP Inspector: Table 7.4.1 of the Local Plan Viability Study excludes most of the infrastructure listed for the Hall Farm site in the IDP. In particular, there is no reference to highway works (around £140 million), community facilities (£5.3 million), sub-station capacity upgrades (£16.8 million), sports facilities (£15.2 million), and open space (£10.6 million). Have these infrastructural costs been considered in the Viability Study? If not, has the proposed development been subject to any other site-specific viability testing that considers the infrastructural costs set out in the IDP?

Details in this outline planning application:

- (a) The total construction cost of the development is stated as £1.05 billion. However, there appears to be no highway works costing listed for community facilities, raising questions about how this infrastructure would be funded.
- (b) In addition, details of the aforementioned costs of the M4 bridge and River Loddon bridge are not visible in the application. How many infrastructure projects are uncotted, which, if costed, would cause this application to be financially unviable?

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.

At the EIP, RoU made claims that they were experienced and trustworthy for the delivery of the two major highway projects. However, the opening of Phase 1 of the Shinfield bypass, including the bridge over the M4 and the access to the science park, was delayed due to flooding issues on the road arising from the seeping of groundwater up from underneath the road and through the surface. This took some time to resolve and arose from a lack of understanding of the underlying ground and the movement of groundwater across the site. In Phase 2, from the Science Park roundabout to the Magpie and Parrott junction on the Arborfield Road, the work was delayed due to issues with the contractors having to be thrown off-site so as to enforce proper behaviour and changes required by WBC to the design of the junction with the A327. This experience does not support RoU's claims of being an expert and reliable supplier of infrastructure projects.

We were surprised to hear at the EIP that RoU will not be required to pay £94 million in CIL contributions on the LGV application. The justification was that RoU would undertake all the work required. Experience in Shinfield shows that commercial and retail premises delivered by RoU are very delayed and reduced in scope and size when they are actually delivered. I would prefer WBC to deliver these facilities to ensure democratic control over these projects. RoU should pay WBC the full price of the delivery of these necessary infrastructure requirements. If they cannot do so, then presumably the application lacks financial viability.

The Parishes of Arborfield and Shinfield would normally expect to receive their 25% share of CIL payments. The proposal appears to give the release of community funds to RoU, who are likely to use them to extract concessions in the future by both WBC & local parishes. The full 25% CIL contributions should be paid to the qualifying parishes and should not subject them to being held to ransom by RoU. It was said at the EIP that RoU could deliver CIL-type projects more cheaply, which again supports my concern about the overall financial viability of this application.

In conclusion: 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?

Further problems

Additional points that were not raised by inspectors have since emerged following the submission of the outline planning application:

Section 3.3.2 of the planning statement reads: '*The nearest rail station is at Winnersh, which has no car parking, approximately 3km to the northeast, which provides regular and frequent services operating between Reading and London Waterloo. Reading station, which forms an important hub on the national rail*

network, is 7km to the north, while Green Park station (opened 2023) is approximately 6km to the west.'

- (a) The distances involved, the travel times, cost and availability of car parking make it unlikely that there would be a significant modal shift from car to rail from this development.
- (b) In this regard, the recent NPPF policy effectively designates land within 800 metres of railway, metro, or light rail stations as preferable for housing development.
- (c) It simplifies approvals for appropriate housing forms, sets density and floor-space standards, and excludes certain high-risk or heritage areas. The main aim is to advance housing supply, foster transit-oriented development, and make better use of available land in proximity to transport infrastructure. Notably, the considerable distance from LGV to the nearest railway line at Winnersh, a distance of 3km, does not appear to address this policy. The new NPPF does not support housing on this site since it is over 800 m from a railway station.

At the EIP Boyer, planning consultants, representing Ashridge, Wokingham, made the observation at the Examination in Public held in November 2025, that reasonable alternatives to LGV at a lower risk of flooding were not considered.⁵ They noted: '*The planning application is not sound, on the basis that paragraphs 35(b) and (d) of the NPPF have not been complied with. This is on the basis that the planning application is not justified, on the basis of failing to properly take into account reasonable alternatives (per 35(b)), and the planning application is not consistent with national policy (per 35(d)).*'

There, therefore, has been no proper consideration of whether there are reasonably available sites at a lower risk of flooding compared with LGV.

10. Conclusion

In summary, the outline planning application has not visibly addressed infrastructure delivery, traffic impact, and potential issues with water & sewage that were raised by the inspectors at the EIP. The location of LGV and its distance to the nearest railway station seem to be against current policy, and other alternative sites should have been considered that are at a lower risk of flooding. There also appear to be deliverability and financial viability issues with this application, which appear to have not been properly assessed and could render this application undeliverable and financially unviable.