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Our Ref: 35956

Your Ref: 241933 and 242279

Dear Emy

241933 - Land west of Old Wokingham Road and North and South of Easthampstead Road Wokingham

This letter is presented on behalf of Kier Ventures Limited and Miller Homes Ltd (“the Consortium”), who are the prospective developers / promoters of Phase 2b of the South Wokingham Strategic Development Location (“SDL”). The Site forms the largest portion of the adopted South Wokingham SDL, which was allocated in the Council’s Core Strategy 2010 under Policy CP21. Policy CP21 was identified to deliver 2,500 dwellings and includes Phase 1, which has now been completed to provide 636 dwellings north of the railway line (known as Montague Park), an approved outline application for 215 dwellings at Phase 2a (land north of Waterloo Road controlled by Kingacre Estates (ref. 190914)) and an application with a resolution to grant consent for 171 dwellings at Phase 3 (land southeast of Finchampstead road controlled by Persimmon Homes (ref. 192325)).

Planning permission was secured in July 2024 for the Phase 2b development (ref. 191068), comprising an outline application, with all matters reserved except for principal means of access to the highways, for a mixed-use development of up to 1,434 dwellings, a two-form entry primary school, neighbourhood centre, public open space, play areas and landscaping; with a full application for the proposed Suitable Alternative Natural Greenspace.

This letter is submitted in response to the following Planning Applications (“the Applications”):

- **241933 - Land west of Old Wokingham Road and North and South of Easthampstead Road Wokingham**
Description: Hybrid application comprising an outline application with all matters reserved except means of access for a mixed use, residential-led development (up to 850 dwellings) including a neighbourhood centre (Use Classes E and / or F) public open space, play areas, allotments, drainage and other infrastructure, landscaping and demolition of existing buildings on the site; and a full application for the proposed Suitable Alternative Natural Greenspace (SANG) with associated car parking and landscaping.
- **242279 - Land north east of Easthampstead Road Wokingham**
Description: Outline application with all matters reserved except means of access for up to 180 dwellings and associated infrastructure including open space, play space, landscaping, SuDs and green infrastructure.

The Applications form part of the proposed draft allocation SS12 (South Wokingham Strategic Development Location) in the Wokingham Borough Council Local Plan Update Proposed Submission Plan, which was submitted to the Secretary of State for examination on 28th February 2025.

Policy SS12 includes the delivery of around 2,975 dwellings, comprising 1,875 dwellings through completions, extant planning permissions and resolutions to grant planning permission (including the 1,434 dwellings from Phase 2b) and an additional 1,100 dwellings on land to the south of Waterloo Road (which forms the Application site).

The Consortium does not object to the principle of the applications in principle, but has comments in relation to the prematurity / deliverability of the development, education provision and highways matters.

It must also be mentioned that application reference 241933 has proposed an affordable housing provision at 35%, which is demonstrably below the Local Plan Update requirement for the draft allocation (40%).

Prematurity of the development

Paragraph 50 the National Planning Policy Framework (2024) states arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances that where both:

- a. the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
- b. the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

Paragraph 51 of the Framework states “refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process”.

The combined effect of the Applications would be circa 1,030 homes, which is substantial development for the District. The Site will be located in a sustainable location benefiting from inter alia, the facilities and linkages within and through the committed phase 2b planning permission.

The housing trajectory published with evidence base to the Wokingham Borough Council Local Plan Update Proposed Submission Plan, assumed housing delivery at the Application site will commence in 2029/30, however, the Consortium raises concerns that the development subject to the Applications can only be built out / delivered sequentially once a significant proportion of the committed SWSDL developments have been constructed. This is because the Phase 2a, 2b and 3 developments provide, inter alia, facilities and linkages to Wokingham without which the extension will be isolated and unsustainable. Furthermore, the Applications sites are remote and disconnected from the settlement and do not provide active travel connections on key local routes. Given the size and scale of the Phase 2a, 2b and 3 developments, this could take at least 10 years to build out.

The cumulative effect of development of the Applications, would be significant and undermines the plan-making process, which has reached Regulation 19 stage, but is not formally adopted as part of the Development Plan.

As such, the Applications are premature and development from it should come towards the latter end of the emerging Plan period (i.e. beyond 2035).

Education provision

Policy SS12 of the draft Local Plan Update references the need for two primary schools; a two-form entry school delivered by the committed development (i.e. the Phase 2b development) and a one form entry school delivered as part of the South Wokingham Extension (i.e. the Applications).

The Consortium supports the need for a primary school on the Applications site, if it is deemed necessary to accommodate the pupil yield. However, the Consortium has made representations to the Regulation 19 Consultation, raising concern that whilst it is appropriate to make policy provision for two primary schools in the planning of the SWSL, demographic change in terms of pupil in terms of pupil yield over the plan period may change, while the viability / efficiency of a one-form entry school is questioned.

The Section 106 agreement for the Phase 2b development at South Wokingham sets out a trigger for reviewing the primary education need, with the Council needing to justify primary demand prior to the two-form entry school being implemented by the developer. A proportionate approach will need to be taken if the Applications are approved. So, if at the trigger date, only a two-form primary school is justified when taking into account potential pupil yield from the Applications site i.e the one-form entry primary school is not required, then appropriate Section 106 contributions in lieu of on-site provision should be secured from the Applications to fund the proportional implementation cost of the two-form entry school at the Phase 2b development.

Highways

These representations should be read together with the accompanying technical review undertaken by i-Transport on behalf of the Consortium (Appendix 1). The review has considered the applications against current and emerging local planning policy; the proposed access strategies and reliance on the Phase 2b development and the South Wokingham Distributor Road ('SWDR'), the accessibility approach; and the traffic impact in relation to off-site infrastructure secured through the SDL.

Regarding planning policy, for the reasons set out in Section 2 of Appendix 1, it is evident that the Applications in their current form, fail to comply with the emerging Local Plan policy SS12 and the Development Guidelines. Additionally, the i-Transport review identifies the Applications are severely lacking in providing sufficient information regarding the access arrangement formed by the proposed priority junction from Easthampstead Road on the western side of the site serving Pearces Farm, or from Old Wokingham Road on the eastern side of the site and Easthampstead Road on the western side serving Priors Farm.

The i-Transport review confirms the Applications to extend the SDL place significant reliance on infrastructure to be delivered through Phases 2a, 2b and 3 of the SDL, including schools, employment, leisure facilities and local centre services. The Applications are remote in location and would not provide active travel connections on either Easthampstead Road or Old Wokingham Road corridors and cannot be sustainable forms of development without the planning permissions at Phases 2a, 2b and 3 of the SDL. The planning consents for the Phase 2b development comprises conditions that will secure the delivery of physical works on these corridors in order to provide a pedestrian and cycle route connecting north of the railway line and on towards the town centre.

Further, the i-Transport review identifies the public transport strategy for the Applications relies on the committed bus strategy secured as part of the Phases 2a, 2b and 3 developments and the accessibility to bus stops along the SWDR, none of which would be contributed to by the Applications.

Infrastructure contributions

The pedestrian and cycle links, off-site highways improvements, the public transport strategy and other committed infrastructure forms a considerable financial contribution being made by the Phase 2a, 2b and 3 developers in order to fund significant infrastructure through the SDL. The Applications can only be made sustainable through the committed infrastructure and therefore will clearly benefit from those what is being provided by other planning consents.

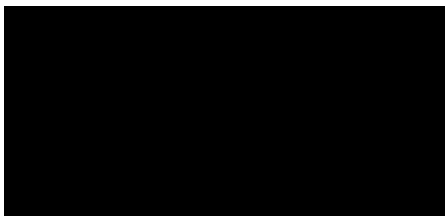
Schedule 16 (6) (Infrastructure Delivery Plan Partnership) of the Phase 2b Section 106 Agreement sets out that infrastructure contributions will be equalised across the SDL. Policy SS12 of the Local Plan Update, as submitted for examination, retains the SDL status, with the extension land included.

Both Application sites fall within the adopted SDL boundary (Policy CP21) and therefore the Council expects all developments within the area to make contributions to infrastructure to mitigate the impacts of the development. By way of an example, a planning application for 54 dwellings on land to the west of St Annes Drive and south of London Road (ref. 203544) was allowed on appeal and was an ad hoc addition to the SDL. This consent includes an obligation for a contribution of £305,970 towards strategic highways improvements, as a proportionate contribution to highways works associated with the SDL. This position was accepted by the Inspector.

As such, it is clear that the same principles apply and the Applications will need to contribute and fund committed and future infrastructure through an equalisation of the works in order to contribute proportionately to infrastructure through the Section 106 Agreements.

We look forward to engaging with the working with the Council and the developers of the extension applications to equalise the costs of the infrastructure.

Yours sincerely



Matt Harris

Associate