

EXAMINATION OF THE WOKINGHAM LOCAL PLAN UPDATE

Inspectors : Thomas Hatfield BA (Hons) MA MRTPI and Mark Philpott BA (Hons)
MA MRTPI

Programme Officer: Ian Kemp

Email ian@localplanservices.co.uk

Ian Bellinger
Head of Planning Policy
Wokingham Borough Council
Shute End
Wokingham
Berkshire
RG40 1WR

April 2025

By email via the Programme Officer

Dear Mr Bellinger,

EXAMINATION OF THE WOKINGHAM LOCAL PLAN UPDATE

1. Further to the submission of the Wokingham Local Plan Update, we have begun our initial reading of the Plan, the supporting evidence and representations.
2. Based on what we have read so far, we have several initial questions and requests for further information and clarification, which are set out below. The Council's responses to these will help to inform the matters, issues and questions (MIQ's) and the remaining timetable for the examination.
3. At this stage, and based on the submitted evidence, we have particular concerns about the delivery of housing including in relation to Loddon Valley Garden Village. It may be necessary to hold early hearing sessions in relation to these matters.

Housing Delivery

Loddon Valley Garden Village ('LVGV')

4. Please could the Council provide a note on the phasing assumptions that have been applied to this site that addresses the following matters:

- The milestones that would need to be achieved in order for the first dwellings to be delivered in financial year 2026/27. This should include the timescales for securing full planning permission, discharging of pre-commencement planning conditions, finalisation of an agreed masterplan and other strategies (as required by Policy SS13), and completion of upfront infrastructural works.
 - The evidence and assumptions that underpin the assumed annual delivery rates set out in the Housing Trajectory (HO8).
 - For comparison, the lead in times and annual delivery rates achieved at the SDLs allocated in the Core Strategy Local Plan (2010).
 - The following highway and energy infrastructural improvements are described as being either 'critical' or 'essential' for LVGV in the Infrastructure Delivery Plan ('IDP') (IN7), and each has an indicative cost of more than £10 million. What are the delivery timescales for these infrastructural improvements, and how many dwellings could be occupied before each is completed?
 - Bridge over the M4 motorway
 - Bridge over the River Loddon
 - Loddon Valley pedestrian bridge
 - Dual carriageway connection to Meldreth Way roundabout
 - Arborfield Primary Sub-Station capacity upgrades
5. Table 7.4.1 of the Local Plan Viability Study (VI1a) itemises the infrastructural requirements for the LVGV site. However, the costs that are listed here differ significantly from those provided in the IDP for the same items. Why is this the case?
6. Table 7.4.1 of the Local Plan Viability Study excludes most of the infrastructure listed for the LVGV 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 LVGV been subject to any other site-specific viability testing that considers the infrastructural costs set out in the IDP?
7. Would LVGV also be required to contribute towards any of the 'critical' or 'essential' infrastructure identified as 'Borough wide' in the IDP in order to mitigate its highway impacts?

8. What are the costings in the IDP relating to LVGV based on? Do they reflect current prices?
9. Will all planning permissions within LVGV be required to contribute to the delivery of the infrastructure identified in the IDP? How will the contribution from each scheme be calculated? How will the delivery of this infrastructure be coordinated?
10. The Council's response to the Regulation 19 representations (CD4f) states that a planning application for this site is "*due to be submitted in 2025*". Is this likely to be an outline or full application?

South Wokingham SDL

11. How many dwellings have already been completed at this site? Why was there a pause in completions at this site after 2021/2022?
12. How many of the infrastructural improvements listed as 'critical' or 'essential' in the IDP have already been delivered or fully funded through the first phase of development?
13. Policy SS12 states that the development of the site must be supported by a comprehensive masterplan, and a series of strategies. Have these documents already been progressed as part of the initial phases of development?
14. Please could the Council provide a note on the phasing assumptions that have been applied to this site that addresses the following matters:
 - The milestones that would need to be achieved in order for new dwellings to be delivered in financial year 2027/28 on land that does not currently have full planning permission. The Council's response should include the timescales for securing full planning permission, discharging of pre-commencement planning conditions, agreement of a masterplan and other strategies (as required by Policy SS12), and completion of upfront infrastructural works.
 - The evidence and assumptions that underpin the assumed annual delivery rates set out in the Housing Trajectory.
 - What are the delivery timescales for the construction of the 2 primary schools identified as being 'essential' in the IDP, and how many dwellings could be occupied before each is completed?
15. Has this site been subject to any site-specific viability testing?

16. Representation 0264 by Miller Homes and Kier Ventures refers to a dispute regarding the delivery of the South Wokingham Distributor Road. Is the Council able to provide any update regarding this?
17. Please could a plan be produced of this site that shows 1) the boundary of the allocation, and 2) the boundaries of each planning permission / phase of development referred to in the trajectory.

Arborfield Green SDL

18. How many dwellings have already been completed at this site?
19. How many of the infrastructural improvements listed as 'critical' or 'essential' in the IDP have already been delivered or fully funded through the first phase of development?
20. Policy SS11 states that the development of the site must be supported by a comprehensive masterplan, and a series of strategies. Have these documents already been progressed as part of the initial phases of development?
21. Please could the Council provide a note on the phasing assumptions that have been applied to this site that addresses the following matters:
 - The milestones that would need to be achieved in order to meet the assumed lead in times on land that does not currently have full planning permission. The Council's response should include the timescales for securing full planning permission, discharging of pre-commencement planning conditions, agreement of a masterplan and other strategies (as required by Policy SS11), and completion of upfront infrastructural works.
 - The evidence and assumptions that underpin the assumed annual delivery rates set out in the Housing Trajectory.
 - What are the delivery timescales for the construction of the primary school identified as being 'critical' in the IDP, and how many dwellings could be occupied before it is completed?
 - How many dwellings can be occupied before the improvements to the Arborfield Sewage Treatment Works are delivered?
22. Has this site been subject to any site-specific viability testing?

23. Please could a plan be produced of this site that shows 1) the boundary of the allocation, and 2) the boundaries of each planning permission / phase of development referred to in the trajectory.

Housing Land Supply / Trajectory

24. Does the submitted Housing Trajectory demonstrate that there will be a 5 year supply from the date that the Plan is adopted?

25. The HELAA (HO7) provides limited detail on the approach that has been taken in calculating the windfall allowances. Accordingly, please could the Council prepare a note that addresses:

- The definition of a windfall site that has been used. Is this simply a site that was not allocated for housing development in a previous Local Plan?
- A justification for the separate Wokingham Town Centre windfall allowance - no reference is made to this in the HELAA report.
- The number of windfall completions that have been delivered in each year of the trend period (2010/11 to 2022/23) – split into small sites, large sites, and sites in Wokingham Town Centre.
- Whether historic windfalls in Wokingham Town Centre were removed from the trend analysis for large/small windfall sites to avoid double counting.
- A schedule of all 'large' windfall site permissions that have come forward in the trend period including the number of dwellings for each and the description of development.
- A justification as to why windfall delivery will continue to come forward in the years ahead (in each category) as required by paragraph 73 of the Framework (2023 version).

26. The HELAA and Housing Trajectory use a base-date of 1st April 2023. Is it intended to update this evidence to a base-date of 1st April 2024 or 1st April 2025? If so, when will this update be available?

27. The HELAA does not contain maps of the assessed sites. Please could a pdf with a map of each assessed site be provided?

Other Matters

28. In addition to the above, we would also be grateful for clarification on the following matters.

Duty to Cooperate

29. Have any Local Planning Authorities or other prescribed bodies made representations under Regulation 20, or subsequently, that claim the duty to cooperate has not been complied with?
30. What, if any, outstanding strategic matters are subject to ongoing discussions with any local planning authorities or other prescribed bodies and what is the latest position in regard to those?

Plan Period

31. The Plan looks forward 14 years from the assumed adoption date in 2026. In its response to the Regulation 19 representations the Council states that it has "*carefully considered whether to extend the plan period to 2041*" but that "*the benefits are disproportionate to the time, cost and resourcing required*". Please could the Council set out which evidence base documents it considers would need to be updated in order to extend the Plan period beyond 2040, and what work this would entail?

Flood Risk

32. The Statement of Common Ground ('SoCG') between the Council and the Environment Agency (WBC4) specifies that a review of new flood zone data (which was seemingly subsequently published on 25 March 2025) needs to be undertaken to ascertain whether there are any implications for the Plan. When is this review anticipated to be completed?
33. 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 2025-2030. Have these improvements been secured? Please provide any relevant documentation which sets this out.
34. Appendix A of the Level 2 Strategic Flood Risk Assessment 2 ('SFRA2') (EN3a) suggests that sewer flooding, which is not mapped, is a constraint at the LVGV site. It also indicates that safe access and egress is not possible in a 1% annual exceedance percentage plus 40% climate change surface water event. Are these points addressed in the evidence?

35. What is the timescale for the preparation of the further evidence for site allocation SS14.23, which is referenced in the SoCG with the Environment Agency?

Self and Custom Build

36. The Self-build and Custom Housebuilding Topic Paper (HO11) refers to the Council's self-build register and states that "*at the end of most recent base period at 30 October 2023, the register includes 266 individuals on Part One and 357 on Part Two of the register*". Is this data now available from the base period ending October 2024?

Employment Land

37. Table 6 of the Employment Land Topic Paper (ED3) states that completions totalling 41,284 m² took place during 2022-23, and that commitments for 7,731 m² were extant at that time. Were those permissions / sites taken into account in the Employment Land Needs Review (ED2)?

Valued Landscapes

38. In its response to the Regulation 19 representations the Council refers to a 2017 Appeal Decision from Wendover. Is this appeal decision currently in the Examination Library? If not, please could it be added to it.

Climate Change and Energy

39. In its response to the Regulation 19 representations, the Council state that Policy CE5 "*is reflective of best practice policies recently found sound elsewhere*". Are copies of these 'best practice policies' set out in the submitted evidence base? If not, please could these be provided.

Transport

40. The SoCGs with Highways England (WBC2) and Bracknell Forest District Council (WBC3) suggest that there are outstanding queries and further work to be undertaken in respect of transport modelling. Please could the Council clarify what is intended to be produced and provide an indicative timescale for this.
41. Paragraph 5.3.30 of the Transport Assessment Report (TR1a) suggests that a merge / diverge assessment report is available regarding projected future highway impacts in the vicinity of Jennett's Park roundabout. Please could this document be added to the Examination Library.

Supplementary Planning Documents ('SPDs')

42. Please could the following SPDs and strategy documents, which are referred to in the Plan, be added to the Examination Library:

- Arborfield Garrison SDL SPD
- South Wokingham SDL SPD
- Wokingham Town Centre Masterplan SPD
- Borough Design Guide SPD
- Affordable Housing Strategy (2024-28)

Next steps

43. We would be grateful for an initial response to this letter by 14th May 2025. We appreciate that this letter covers a wide range of matters. If further work needs to be undertaken to enable the Council to respond fully to any of the questions or requests for further evidence, please provide a timetable for its completion.

44. Please upload this letter on to the website as an examination document.

45. If you have any queries, please contact us through the Programme Officer.

Yours sincerely,

Thomas Hatfield and Mark Philpott

INSPECTORS