

PLANNING REF : 251621
PROPERTY ADDRESS : 18 Park Avenue
: Wokingham
: RG40 2AJ
SUBMITTED BY : Mrs Helen Thomas
DATE SUBMITTED : 20/08/2025

COMMENTS:

Design, appearance and materials (including heritage issues) -
Objection on the basis that the proposed development is not in keeping with surrounding buildings and thus breaches Wokingham Borough Council's Design Guide, specifically R1, R2 of section 4.2 and R11 of section 4.5

- Paragraphs 2.6 and 3A.2.6 of Wokingham Borough Council's Design Guide state that there must be an inclusive process, engagement and consultation as part of the design process. There has been no consultation with the owners/occupiers of neighbouring properties who will be affected by the development.

- As the conclusion to the Design and Access Statement (Part 2) submitted as part of the planning application acknowledges (see page 50) the Wokingham Town Centre Masterplan "describes proposed built form for the gateway to be limited to 3 storeys and to relate to the surrounding residential developments. Materials and massing should relate to the local character with designed being conscious of key views and side elevations are likely to be important and visible" (emphasis added). The Masterplan limits the height of any building on the site to 3 storeys. This is not a design proposal, or goal to be achieved. Furthermore, despite quoting from the Wokingham Town

Centre Masterplan in this way, the proposed development contains no sense of the heritage character of existing buildings and bears no relationship to its surrounding buildings.

- The application refers to taking 'design cues' from recent local developments, in particular Elms Field. These are not the most appropriate cues because they cannot be seen from the site.

Instead, cues should be taken from existing residential properties which more immediately surround the proposed development. These properties are more traditional and two storeys. The proposed development is not

consistent with or sympathetic to the properties surrounding it in Station Road and Park Road. The building is in an entirely different style to the properties in the neighbouring Park Road, Wellington Road and Station Road and unlike those properties is not set back with its own garden space and parking spaces.

- R11 states that "New housing should be designed to create street scenes with a coherent character, that relates well to, or enhances, existing street scenes (in terms of scale, rhythm, proportion, height, materials and colour), particularly in areas where built form contributes significantly to the local character". This development does not do this. It is out of character with its surrounding buildings. The link to Elms Field is too distant.

- The plans submitted with the application are inconsistent. The plan view shows a coffee van. The south elevation does not. The south elevation plan shows trees where the plan view shows disabled car parking spaces. Which are the correct plans?

2 Scale, height and mass - Objection on the basis that the bulk/mass of the proposed building is out of character for the area and out of proportion to its surroundings and thus breaches Wokingham Borough Council's Design Guide, specifically R9 and R10 of section 4.5

- The bulk/mass of the proposed development is in line with the peak of the roofs of the surrounding buildings, then the proposed development has a roof on top. It will therefore be a storey taller than any other surrounding building.

- In particular, proposed flats 20 and 21 cause the development to be three storeys high along Park Road. There is no precedent for three storeys (plus roof) in Park Road. At the very least, the bulk and mass of the building adjacent to Park Road should be reduced in order to reflect the neighbouring properties.

- From a point of view of mass, the proposed development is significantly larger than existing properties immediately neighbouring the proposed development which are Victorian/Edwardian houses with

ample parking spaces on the site of the houses. Any development on Park Road, including this one, should reflect the scale, height and mass of the existing properties on Park Road.

- It may be argued, as per paragraph 9.5.1 of the Wokingham Town Centre Masterplan, that this is a landmark site and thus the building on it can be larger, but that is only the case for the part of the development facing the train station. The section of the proposed

building along Park Road is far too visually dominant for a cul-de-sac of low-rise Victorian / Edwardian properties, which is what Park Road is. The plans submitted with the planning application do not give an accurate representation of the dominant impact and

overbearing nature of the proposed building. The proposed east elevation plan does not show the Wellington Road properties adjacent to the proposed building, thus does not show the reality of the massing. Nor do any of the plans show the massing of the building in comparison to the properties opposite on Wellington Road. The south elevation plan shows just how significant the proposed building is compared to the other existing buildings on the same side as Park

Road. Were a plan to be produced showing the 3 properties at the end of Park Road, opposite, alongside and diagonally opposite the development the overbearing mass of the building will be immediately apparent.

- Paragraph 9.3.1 of the Wokingham Town Centre Masterplan states that the Masterplan " seeks to preserve and enhance the town centre's historic pattern. It therefore adopts a coherent perimeter block

structure to protect the building line of historic streets and spaces." Existing properties in Station Road, Wellington Road and Park Road are 2 storeys, so the proposed building of 3 storeys plus peaked roof, does not protect the building line of historic streets and spaces.

- For the reasons above, the development should be 2 storeys throughout (ground and 1st floor using the terminology in the planning application) and certainly should not have three storeys (described as ground, 1st and 2nd floors in the planning application) facing Park Road.

3 Impact on neighbours - overlooking and noise - Objection on the basis that the development will have an extremely negative impact on its neighbours by overlooking them, causing a loss of light to them and as a result of the inevitable noise generated by 21 new homes. - As stated above, due to its size the proposed development will dominate its Park Road as well as its Wellington Road and Station Road neighbours. It will be completely overbearing.

- The flats with balconies and windows looking out on to Park Road

and to the rear of the development will overlook 1 and 4 Park Road. Light will also be blocked to 4 Park Road.

- 21 flats and their occupants will significantly increase the noise and disruption to what is a quiet road, notwithstanding its central location.
- Due to the unrealistic "car free development" concept (see below), It will result in nuisance parking outside residents' properties.

4 Parking - Objection on the basis that the development will result in nuisance parking both during and following the development's construction unless adequate car parking is provided or enforceable controls are imposed as a condition of planning permission. The adjacent roads, Park Avenue and Park Road, are private roads maintained by an incorporated company (Park Road and Park Avenue Limited). As private property, the public is not permitted to park on these roads. Any intended development cannot result in parking on private property. The proposed parking in the planning application is grossly insufficient for residents, visitors and carers associated with the proposed 21 flats. It is a certainty that the proposed development will result in parking on Park Avenue and Park Road during construction and post construction as explained further below.

4.1 During construction

- Paragraph 2.11 of the draft Construction Management Plan states that "There will be no on-site car parking." Where will construction workers park? They are unlikely to want to pay to park all day in the train station car park. What will be done to ensure construction vehicles and construction workers do not park on Park Road?

- The Construction Management Plan has sections that are incomplete (for example paragraph 2.1.3: "A minimal increase of traffic movements will occur along local" - this sentence is both inaccurate and incomplete) or simply copied and pasted from another report (for example paragraph 2.1.5: "On street parking is not expected to be affected during the construction period with deliveries from Brading Road using the existing access arrangements". Deliveries will be from Park Road. Where is Brading Road? It would appear that no proper consideration has been given to the impact of the construction of this development on its neighbours.

4.2 Post construction

- The application proposes 2 disabled parking spaces and 4 visitor spaces for 19x1 bed flats and 2 x 2 bed flats. This contrary to the Local Plan policy of applying Parking Standards that are set out below.

- The private development of 14 flats on the former Jewsons site on Barkham Road/Oxford Road has 1 parking space per flat. Surely the same rule should be applicable when the Council applies for planning of this site?

- Whilst, in line with the Wokingham Town Centre Masterplan, the reduction of car movement and parking is a long-term aim of the Council, it is completely unrealistic to expect a development of 21 flats to be "car free". Paragraph 7.4.6 of the Wokingham Town Centre Masterplan states that in the medium to long-term, future developments within the town centre must seek to "materially reduce car parking provision and contribute to enhanced parking management

and sustainable transport improvements that offer comparative door-to-door journey times." (Emphasis added.) A reduction below the average of 1.5 spaces per dwelling (as per paragraph 10.6.11 of the

Masterplan) would suffice. No parking provision, other than 2 disabled bays and 4 visitor bays, for 21 flats is completely excessive and unreasonable.

- The application's premise is that parking spaces are not needed because of the location of the site and availability of public transport. (Why was that not allowed for the Jewson site?) The Transport Plan refers to bus routes 121, 125, 125A, 125B, 145, 93 and 3 Leopard, but does not reference the quantity or regularity of these services. They are as follows:

o 121 - Norreys to Broad Street to Tesco. Half hourly between 9.45 and 15.30, less frequent and not full distance outside those hours. Station interchange between about 7am and 9am, then nothing until 16.30, hourly thereafter but last bus 19.30. Less at the weekend. Journey time 30 minutes compared with 5-10 minutes by car.

o 125/125A/125B - Wokingham Town Centre - Tesco - California Crossroads - Crowthorne. 8 buses in all spread over 11 hours (approx. 7am-6pm). Not all buses stop at all stops. Two services per day at the weekend. 30-minute journey to travel 3 miles.

o 145. Three Mile Cross - Riseley - Finchampstead - Wokingham - Arborfield - Winnersh. Run by 'Horseman', appear to be just two per day at 9.45 and noon. Some stops are drop off only, not pick up.

o 93. No timetable found.

o 3 Leopard. Reading - RB Hospital - Shinfield - Arborfield Garrison - California Crossroads - Wokingham. Journey time 80-90 minutes which far exceeds the equivalent by car. Over 50 buses per day but not all stop at all stops.

In summary, there is no evidence that there are adequate bus services such that residents of the proposed development will not wish to own a car. The bus service certainly does not meet the criterion of offering public transport that offers "comparative door-to-door

journey times" see quote from paragraph 7.4.6 of the Wokingham Town Centre Masterplan above, particularly when waiting times are included.

- There is also the railway as a source of public transport, but to meet the benchmark of "comparative door-to-door journey times" the destination needs to be next to a railway station also, not a frequent occurrence.

- Existing residents of houses in Station Road, Wellington Road, Park Road and others in the town centre own cars. Living near public

transport does not stop car ownership for the simple reason that public transport does not serve where residents wish to go or does not provide "comparative door-to-door journey times". There is no reason to believe residents of the proposed developments will not need cars.

- Paragraph 7.5.2 of the Wokingham Town Centre Masterplan refers to 'Demand Management' in the context of transport capacity. Reducing the supply of parking spaces to almost zero, as proposed in this planning application, is not 'Demand Management', it is 'Supply Management'. The development will create car parking overspill, just as the development on the cricket pitch/tennis club further along

Wellington Road did. Slough's Borough Council has admitted that its attempt at a 'car free development' has failed, resulting in dangerous parking problems:

<https://www.sloughobserver.co.uk/news/24688449.horlicks-quarter-link-d-unsafe-parking-slough-borough-council-says/>

To quote from the Slough Observer of 30 October 2024 "Slough Borough Council's goal of encouraging people to use alternatives to cars led it to grant planning permission to new housing developments with little or no parking. But now the council has acknowledged that these efforts have 'not been successful' and have led to parking issues on and near major roads." All the same arguments as Wokingham Borough Council is putting forward in this planning application were used by Slough Borough Council (ie proximity to town centre and public transport) and just like our own local developments, it has been proved to be an utter fallacy that people living in town centres do not own cars. In summary, the comment expressed in paragraph 2.6.7 of the Transport Statement submitted with the application that "The site benefits from excellent rail accessibility, making travel by bus a very viable alternative to private car journeys" is both non-sensical (why does rail accessibility make travel by bus a viable alternative?) and untrue.

- Paragraph 3.1.14 of the planning application's Transport Statement states that "Park Road itself provides very little in the way of on street car parking opportunities which will discourage car ownership". Where is the justification for this comment? Why will limited

opportunities discourage the residents from making use of the opportunities that do exist? The current residents of Park Road and Park Avenue are already constantly finding cars parked which have no connection with any residents. It appears no real consideration has been given to the impact of the "car free development" concept on the development's neighbours.

- Reference is made to double-yellow lines being painted on the first section of Park Road once it is made up to adoptable standard. But how will the proposed double-yellow lines be enforced if this section of the road is not actually adopted? Making it up to adoptable

standard is not good enough. The double-yellow lines will have zero impact if they cannot be enforced due to the Council not having adopted the first section of Park Road. This is a significant omission to the application. It should be a condition of the application that the Council adopts the first section of Park Road

- Overall, how will the Council 'police' the no "car free development" concept (noting here that the Council has stated that the flats will "all be social rented and managed by us" (see the Residents' Round Up summary of the proposed development on 8 August)? Previously (in 2022) Park Road and Park Avenue residents were told that the tenancies of the building proposed at that time could have a clause in them further to which tenants acknowledged that they have no right to park a car or allow their visitors to park a car on Park Road or Park Avenue and that if they breached this clause they would be at risk of forfeiting their tenancies. Will this be inserted in the tenancies for this current proposed development?

5 Highway safety - Objection on the basis that there is inadequate provision for delivery lorries and insufficient consideration has been given to road safety at the junction of Park Road and Wellington

Road.

- Delivery lorries (both to residents and to the Station Road businesses with access from Park Road) - How will they exit the site? They can access forward along the service road behind the development, but there is no turning space. Will they reverse all the way back behind the development on to Park Road and then down on to Wellington Road? This will be dangerous. Or will delivery lorries have to park on Park Road (causing a blockage) and then transport contents on foot along the access road to the rear of the proposed development?

- Park Road/Wellington Road highway safety -For anyone arriving by car, Park Road will be the access point for the development. This increase in traffic will make the junction between Park Road and Wellington Road even more dangerous.

- o The junction between Park Road and Wellington Road is already hazardous now that cars travel at speed down Station Road around into Wellington Road without any impediment (if the pedestrian crossing on Station Road is not on a red light). The inevitable increased

traffic caused by the development will increase the risk of accidents.

- o The proposed disabled parking spaces on Park Road will increase congestion towards the junction and increase the risk of an accident.

- o The 'proposed site plan' references "new tree planting" along Wellington Road and 5 new trees are also shown on the 'proposed west elevation plan'. The Landscape Plan indicates that these trees will be Tilia Cordata 'Greenspire'. The RHS describes this species of trees as "A vigorous and narrowly conical, deciduous tree about 15m tall and 7m wide". Such planting will negatively impact the visibility of oncoming traffic to those exiting Park Road. This planting has been shown on the plans to make the development look more attractive and to detract from its bulk and mass but they are not realistic from a highway safety point of view.

6 Highway Maintenance - Objection on the basis that the construction of the proposed development will damage Park Road that has been paid for by you as a resident and there is no forward provision for its ongoing maintenance in the proposal.

6.1 During construction

- Access to the site during the construction (proposed clearance in November and December 2025 and construction between April 2026 and June 2027) will be via Park Road. Park Road is not an adopted road. The road surface (paid for by residents) is not up to highways

standards. It will be ruined by construction vehicles. Where is the guarantee to Park Road and Park Avenue Limited, the residents company that maintains the road, that damage will be repaired. The

Construction Management Report at section 2.2 anticipates the contractor reporting to Wokingham Borough Council about this not Park Road and Park Avenue limited.

6.2 After construction

- The planning application states that the first section of Park Road will be "finished to adoptable standards" (see the proposed site plan) not that the Council will be adopting the first section of Park Road. This distinction is of fundamental importance.

- If the Council is not adopting the first section of Park Road, will it nevertheless undertake to be responsible for maintaining this

section of Park Road (which is currently maintained at the expense

of residents with contribution from the Council via Park Road and Park Avenue Limited, but which will be used significantly by the tenants and visitors to the Council's development)?

7 Wildlife and ecological impacts - Objection on the basis that current habitat will be destroyed with no adequate replacement provision contrary to R13 of section 4.6 of Wokingham Borough Council's Design Guide (page 45).

- There is a significant and well established poplar tree on the site. As per the 'proposed site plan' the suggestion is that this significant tree, that has a TPO on it, is replaced with a new tree on the corner of Station Road and Wellington Road. On any objective basis this is not an adequate replacement. The suggestion that the TPO can be removed as it is "not appropriate to retain in a restricted urban setting" sets a very worrying precedent for other TPOs in the urban centre of Wokingham. Would such an argument be deemed acceptable if the tree was not on land in the Council's ownership? It is also contrary to the whole ethos of section 4.6 of Wokingham Borough Council's Design Guide

- The planning proposal dismisses the significance of the other vegetation currently on the site and the habitat it has offered for over 2 decades. Green space is now at a premium in Wokingham Town Centre since the cricket pitch and Elms Field were built over. The site does not achieve the mandatory Biodiversity Net Gain of 10% uplift. Where will this be provided offsite?

8 Local, national policy

There is no evidence of an Affordable Housing Viability Assessment being conducted. Overdevelopment of a small plot, as proposed, is not value for money given there will be minimal economies of scale associated with the development of only 21 flats. Consequently, the proposed development does not represent value for money or a sensible use of council funds. The Council should be seeking to develop larger, vacant plots so as to ensure taxpayer value for money.

9 Probity in the planning process

- To quote from the Local Government Association's 'Probity in Planning' guidance, "planning issues must be assessed fairly and on their planning merits, even when there is a predisposition in favour of one side of the argument or the other". I trust that this application will be considered impartially despite the applicant being the Council and the fact that it has been publicised by the Council as though planning permission has already been granted. To quote, for example, from the 'Residents' Round Up' email update of 8 August: "A transformative new housing development is set to be built in Wokingham town centre, providing 21 high-quality, affordable homes for residents." Only in the third paragraph of the article is a reference made to a planning application being submitted. I do hope that the presumption that consent will be given does not indicate bias towards the application within the Planning Committee.