

OBJECTION TO PLANNING APPLICATION REF: 242066

Ascot House, Finchampstead Road, Wokingham, RG40 2NW.

“Full application for the proposed raising and modification of the roof of the existing building plus the erection of a extension to form additional first, second and third floor accommodation in order to create 10 no. additional dwellings with car parking, cycle parking, refuse stores, landscaping and associated works.”

16th Nov 2024

David Jackson
38B Carey Road
RG40 2NP

I wish to lodge my objection to the above referenced planning application.

The site has already provided x24 windfall dwellings through the conversion and change of use of the existing office block building into residential. Any further additional dwellings added to this already tight, compact and heavily constrained site through extensions (upwards or otherwise) would constitute severe overdevelopment resulting in substantial collective harm to the immediate area.

In reading through the submitted application documents, it is clear there are number of errors, discrepancies and contradictions found within the submitted plans, documents, assessments and reports.

I am pleased to see that Cllr Rob Comber has formally requested this application be called in to the Planning Committee.

I also recommend that a site visit is arranged so that Cllrs see first-hand just how tight and restrictive the existing site parameters are, including not least proximity to existing dwellings and the sites current parking arrangements

I support the many other objectors to this application, not least the residents of the current building itself who I note raise important points about the Applicant's conduct and failure to comply with the existing planning requirements of their current/latest permission.

The Applicant refers to the proposal being of "exemplar design", yet many submitted supporting assessments and reports (i.e. Ecology, Transport, Daylight) openly admit shortcomings & failings within their respective criteria's which is hardly testament to exemplar design.

The proposed scheme brings nothing but detrimental impacts upon all existing site users, occupiers, neighbouring residential properties and surrounding local area.

Local residents have submitted objections formally raising a number of substantial issues with the proposed development that I believe constitute more than sufficient grounds to refuse this application when considering National and Local Policy and collectively weighing up the planning balance of the proposal against the many significant detrimental impacts it will have on neighbouring amenity and the surrounding area.

I hope that having a made an informed decision accounting for all the proposals collective deficiencies, it is concluded that any perceived benefit that has been put forward by the Applicant is drastically outweighed by the severe & very real harm this extension will have on its existing site users, immediate surroundings, environment and neighbouring residents.

I therefore hope you also conclude that this application should be **recommended for refusal**.

Existing Site Plan/Planning History

Planning permission has previously been granted at this site for x21 residential dwellings via permitted development. A further x03 basement dwellings have also been allowed under PD rights via the approved construction of a lightwell.

The Site therefore has extant planning permission for x24 total residential dwellings converted from an existing former office building.

A bin store, x24 cycle spaces and x24 car parking spaces are also included/stipulated within these extant permissions.

Under these permissions and subsequent relevant discharge of conditions approvals, there are certain planning obligations that the applicant should already have met.

It appears the Applicant is in breach of Planning Condition 05 of permission 211020 which states; ***“No building shall be occupied until secure and covered parking for cycles has been provided in accordance with the approved drawing”***. These facilities have yet to be implemented, and the applicant has admitted their absence within Section 10 of the submitted 1APP form whereby they confirm a total 0 existing cycle spaces.

This has also been confirmed within objections lodged by current occupiers of the flats.

Existing Site Plan/Parking

The submitted existing site plan (105_PL2_S-02 Rev B) is incorrect.

It depicts x09 parking spaces (x5 regular and x4 disabled) abutting the northern side of Kendrick Close. These nine spaces are in fact proposed new spaces being requested under the submitted planning application.

The submitted Site Location Plan (105_PL2_S_01 Rev B), Figure 1 of the Planning Statement (August 2024), page 6 of the Design and Access Statement, and Fig 1.2 of the Transport Statement also all depict this incorrect existing site plan.

Reviewing current site permissions, all x24 approved spaces for the current residential development should be located to the southside of the current building as stipulated in the permitted site plan drawing 311_PL1_S_03 P1 of permission 211020 (**Fig 1**).

A more detailed layout of the approved parking arrangement (that also confirmed locations of all active and passive EV charging spaces expected of the development) was provided as Appendix A within the 18th March 2021 Transport Note, permitted as part of the same permission.

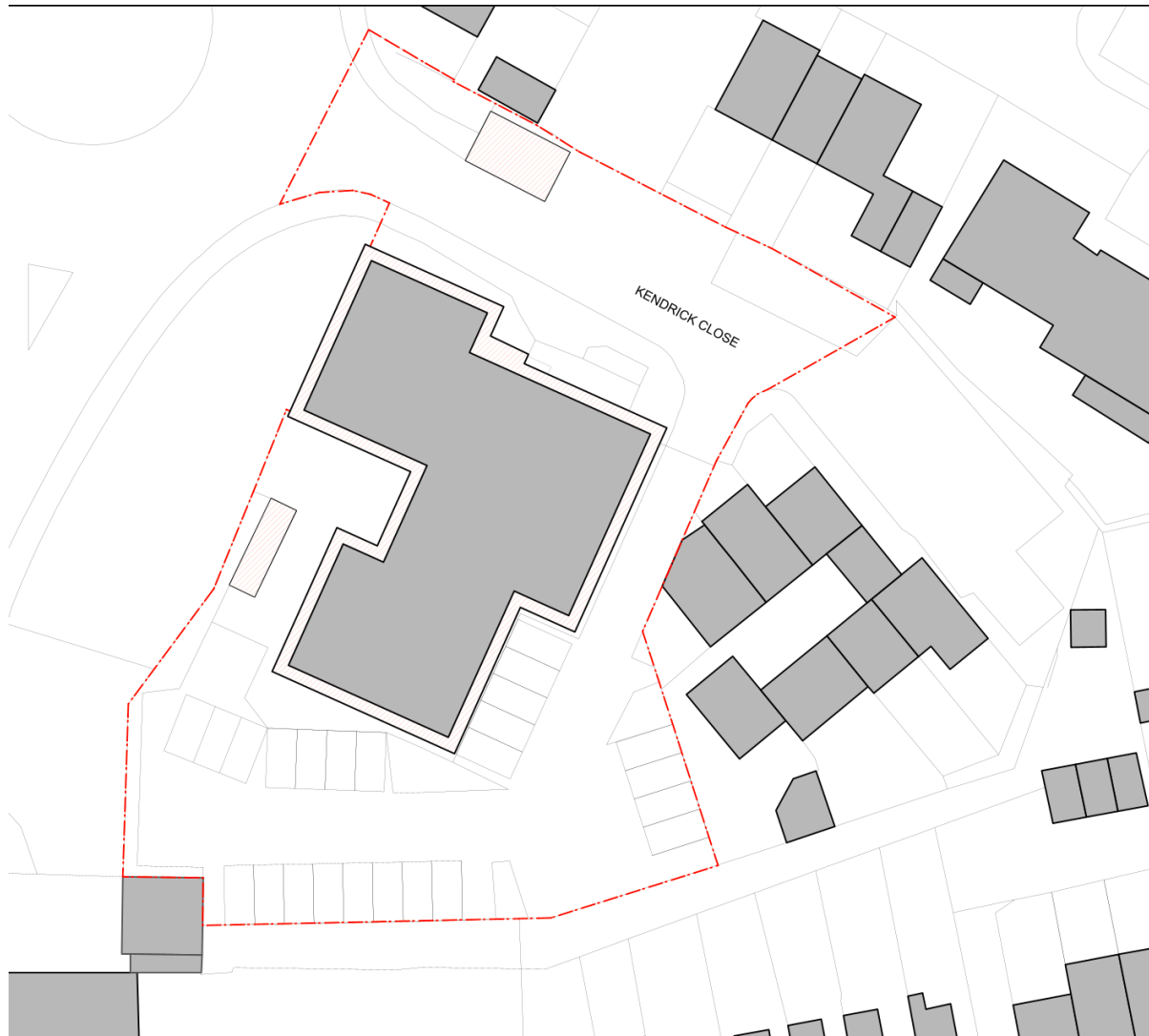


Fig 1

Extract of approved site plan 311_PL1_S_03 P1 listed in the latest June 2021 site planning permission 211022. Note, no approved parking arrangement or layout adjacent to/on Kendrick Close

Vehicular parking wholly to the south of the building is also reiterated within both Section 2 (Site Description) bullet point six of the applicants submitted Design and Access Statement (10-5_DAS_PL2) and Section 2 (The Existing Condition), para 2.2 of the applicants submitted Transport Statement (April 2024); which both state “*Vehicular parking is located on the south of the building*”.

Since the Applicants first phase has been completed, vehicles are actively using an area directly next to the northside of Kendrick Close and east of the bin store to park. Sufficient distance is not available here to allow vehicles to park without restricting the clear width of Kendrick Close which is a shared use access road.

The site does not have any planning permission permitting the area north of Kendrick Close for use as existing residential parking spaces.



Fig 2a
View looking east down Kendrick Close
(August 2023)
www.google.co.uk/maps



Fig 2b
Photo looking east down Kendrick Close
(Nov 2024)

In **Fig 2b** we also see evidenced additional cars parked mounted upon footpaths as well as in the road itself (adjacent to the existing raised brick planter) that further restrict the existing clear width of Kendrick Close for all users.

The available surrounding roads nearby to the development that allow for on-street parking are also already beyond capacity (**Figs 2c** and **2d**).



Fig 2c

Photo looking west along Norton Road.

Cars in the right foreground parked mounted upon footpath and on corner access of cul-de-sac

(Nov 2024)



Fig 2d

*Photo looking east up Carey Road.
Road is full of double-parked cars. Gaps left only for dropped kerbs and site entrances.
(Nov 2024)*

Proposed Site Plan/Parking

Para 6.1 of the WBC Borough Design Guide SPD states: ***“Restraining formal car parking provision for new housing, as part of an overall strategy to reduce travel by car, has not reduced car ownership. Instead, the street scenes in new housing have become dominated by informal parking: on-street, where there is not enough width for passing; on footways; on forecourts too small to accommodate cars”.***

Figs 2a-2d validate this statement. It is clear that car use and ownership at the site and the immediate surrounding area is already regularly causing both road and footpaths widths to be adversely restricted via inappropriate parking, without the addition of a further x10 new flats.

The submitted Transport Statement and Applicants proposed site plan (105_PL2_S_03 Rev C) confirms the intention to rearrange the existing site parking layout and provide an additional x12 new car parking spaces to make x36 in total.

Nine of these new spaces (identified as nos.1-9) including x4 disabled spaces are proposed to the north of Kendrick Close.

The Transport Statement fails to confirm the size of the parking spaces being proposed.

The spaces are 2.4m x 4.8m and inadequate.

This is evident in the swept paths presented as Appendix D to the Transport Statement which show a 4.939m length car overhanging the proposed space.

Scaling off their proposed site plan, only parking spaces numbered 16-29 measure as meeting the min required size of 2.5m x 5m as stipulated in both the 2011 WBC Parking Standards Study and 2012 WBC design guide SPD.

All other spaces (1-15 and 30-36) fall short of meeting the Standards and SPD, appearing as 2.4m x 4.8m.

Para 4.10 of the Transport Statement acknowledges that *“All except two parking spaces are provided with an aisle width of 6m or more”* and *“that as a result of these spaces being wider than standard the slight shortfall on a 6m aisle width is immaterial”*. The spaces referred to are proposed disabled spaces that fail to meet the required width and length for a disabled space.

Should the correct sized parking spaces be plotted for the whole development, it becomes very apparent the Site and proposed development cannot accommodate an additional x12 spaces as proposed, and that min aisle widths of 6m would not be achievable for a lot more spaces than the two spaces already identified by the Applicant.

More importantly, nine correctly dimensioned new spaces north of Kendrick Close would also significantly reduce the clear width of this shared access road, much to the detriment of the existing site users and neighbouring residential dwellings who are dependent on this road as their only means of access.

This is in complete contrast to para 5.35 of the Planning Statement which claims, *“The access arrangements will ensure that safe access through the Site will be maintained”*. The same para mentions x4 new disabled spaces along Kendrick Close but fails to mention the other x5 adjoining regular spaces proposed along Kendrick Close too.

To reduce the width of Kendrick Close to the detriment of the residential dwellings sharing this (as their only) access demonstrates the proposal has a clear disregard for the negative impacts on its surroundings.

An accurate site plan showing correctly dimensioned spaces to the south of the building would also demonstrate many of their x27 spaces as part of the rearranged layout would fail to maintain an aisle width of 6m, while the cumulative distance needed to successfully accommodate the min required 2.5m width spaces would likely see the number of achievable spaces reduced below the stated x27.

it appears that not only have the two active EV charging spaces approved under previous permissions not yet been installed but are to be removed entirely under the proposed new parking layout which depicts passive spaces only.

The current proposal also provides no additional active EV charging space/s as part of the x12 new spaces.

To adhere to their current planning permission and install the required EV charging facilities/spaces, it is interesting to note that many Councils are now recognising EV charging facilities/spaces need to be larger than standard spaces too. Some Councils now insisting spaces of 3m x 6m. This is on the basis that car charging plug-in points vary in location between car models, with this extra distancing then allowing sufficient room to avoid cables, connectors etc becoming trip hazards.

Considering the development could increase the occupancy level of the site by a further x33 residents, the proposal also makes no provision for motorcycle/moped parking. No provision for onsite delivery/parking/temporary waiting spaces for postal vehicles, delivery services or weekly food shop services etc. No provision for short or long-term parking arrangements for the regular maintenance, repair, landscaping and grounds keeping services flattened developments typically require. No provision for visitor parking.

Housing Need/Affordable Housing/Financial Contribution

The Applicant has referenced the latest Five Year Land Supply which at 31st March 2023 stated the Council can demonstrate 3.2yr supply. While a shortfall is currently demonstrated, the report makes no account of Wokingham Borough Councils consistent *overdelivery* of housing provision in recent years. As such, the Council have been challenging Government guidance to ensure that over-delivery is actually rewarded and that, in such circumstances, the presumption in favour of granting planning permission should not apply.

In further strengthening the argument as to why x10 more speculative dwellings are not warranted here, it is extremely relevant to acknowledge this site has already provided x24 windfall dwellings through the conversion and change of use of the existing office block building into residential. The Site was not earmarked for housing development in the current Local Plan, nor has it been within the latest update to the draft Local Plan. No additional land or extension to the Site area has suddenly come to fruition, the proposal is simply trying to squeeze in x10 additional dwellings into this small, heavily constrained site that is already at capacity.

The latest Local Housing Need Assessment (LHNA) (2023) has identified an overall need for affordable housing equivalent to an average of 352 households per annum, or around 45% of Local Housing Need. This is a significant need and provides a clear justification for affordable housing through residential development proposals.

CP5 states that housing proposals of 5-14 dwellings are required to provide 20% affordable. This Application proposes 0 affordable homes.

The Core Strategy also states: ***“Due to the exceptional need for affordable housing in the Borough and to achieve its supply until the SDL in policies CP18-21 deliver, the Council has reduced the thresholds at which affordable housing is sought down to five dwellings (net)”*** and ***“This reduction in threshold to five dwellings recognises the exceptional need for affordable housing within the borough as highlighted in the Berkshire HMA. This indicates that between 64% and 88% of the Borough’s annual housing completions would need to be affordable dwellings”***.

Given the *“exceptional need”* to provide affordable housing in the Borough and factoring in the Site has already permitted x24 dwellings (0 affordable) via PD rights of the existing building, It is highly inappropriate for the Applicant to be proposing a further x10 dwellings of a mix not in accordance with the SHMA, while simultaneously trying to skirt around the

affordable home policy, and attempting to avoid their requirement for off-site financial contribution.

Design/Massing

The proposal fails to meet many requirements of the Borough Design Guide due to its inappropriate height, scale, massing, housing density, and inadequate parking.

The Adopted Core Strategy & Borough Design Guide SPD provide clear and unequivocal guidance as to what constitutes acceptable, good design, including how alterations and extensions to residential buildings should be handled, particularly in relation to their surrounding area. Amongst others, guidance states that;

“that are an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life.”

“Ensuring housing is well connected and provided with sufficient parking without impacting street scene”

“Heights of buildings should respond to a number of factors, including: prevailing heights, scale of importance of building in relation to its surroundings, its position in the street hierarchy, building setbacks, and whether it’s a landmark location”

“Buildings should be designed to relate well to existing street scene in terms of scale, rhythm, proportion, height, materials and colour”.

“For extension and alterations, proposals should be well designed, respond positively to the original building, contribute positively to the local character and relate well to neighbouring properties.”

“alterations or extensions should be clearly subservient to the form and scale of the original building in most situations”

“the design of the proposed extension must be well considered and should complement the existing building, either by adopting its style, or by a carefully considered contrast”.

Passages highlighted in bold are where I believe that the proposal is contrary to and falls short of meeting the required Core Strategy & Borough Design Guide SPD design criteria.

Considering the Applicant would have us believe this proposed development is of “*exemplar standard*”, the private amenity spaces that the development is proposing also appear to be afterthought at best, barely meeting minimum requirements in some cases.

The lack of real usable amenity space is further compounded by the unacceptable level of housing density being proposed, alongside substandard communal garden space and meaningful landscaping.

Daylight and Sunlight Report

The daylight and sunlight report for neighbouring properties (20st Nov 2023) confirms that nearly every single neighbouring property and garden will see a reduction in their amenity by the sheer bulking and massing of the development.

Loss of privacy is not just that created by a direct view through a habitable space window. It is also the loss of clear space around you, any loss of natural daylight, loss of views of open sky and/or horizon, and also the sense of enclosure &/or overbearing presence by a new permanent form in close proximity.

The daylight and sunlight report within development (21st Nov 2023) confirms that 40% of the proposed flats fail to meet required Daylight Provision targets. The justification being suggested that the results are not abnormal in the context of an urban location

This might be the case when assessing a converted office block or existing building within an urban environment, but the proposal consists of entirely new built form. To therefore design a ten flat scheme where 40% of the dwellings fail this requirement is poor design, and just another further compromise the Applicant is willing to propose in order to push through overdevelopment at this site.

Heritage

Prior to its conversion to residential use and subsequent introduction of its current parapet roof, the office block was visible from and within the setting of the nearby Grade II Listed 'The Duke's Head'. The proposal will reintroduce elevated built form in the guise of pitched tiled roofing, rooflights, glazing and brickwork etc that will be once again visible from this asset.

A Heritage Statement should be completed by an independent and suitably qualified Heritage Consultant to establish what degree of harm the proposed extension may have on this Grade II Listed asset.

Community Consultation

There has been none.

The submitted Statement of Community Involvement (Oct 2021) is for a completely separate application and proposal that was submitted and subsequently withdrawn by the Applicant in March 2022. It is over three years old and has no relevance to this current application and should be omitted. Any reference therefore made by the Applicant that they have duly engaged with the local community regarding this proposed development is incorrect.

Ecology/BNG

Paras 2.26, 3.8 and 5.94 of the Planning Statement claims the development will result in an 11.53% uplift in BNG. The actual submitted BNG Assessment and BNG Metric Calculations confirm that only a 10.5% BNG is achieved.

The BNG metric has been submitted in a document format that makes it largely unreadable. The original excel file should be made available.

The submitted Ecological Impact Assessment (Rev 01 18/10/2024) confirms that due to only one site visit, certain species, particularly flowering plants may not have been visible and hence overlooked (para 3.5.1).

The single bat emergence survey was completed in Sept, outside of best practice guidance.

Three integrated bat boxes were installed on the building as part of ecological mitigation for the current permission/development. With the single conducted bat emergence survey being completed outside of best practice guidance survey period, the EclA report refers to previous bat emergence surveys that were carried out over two years ago (2021 and 2022) to reach its conclusions.

The EclA, and specifically the bat survey results reported within are unreliable.

Landscape

To the detriment of both the existing x24 dwellings and neighbouring residents' amenity, the Applicant is proposing removal of several raised brick planters with established landscaping to shoehorn in additional parking.

The Landscape Design Strategy states 3no planting beds have been proposed to enhance the car park area. One of these planters is already existing having been retained from the current permission and is simply being relocated.

Construction Method Statement

The submitted Construction Method Statement (Ref F 22nd April 2024) presents a construction site set up plan as Appendix II (drawing ref 820654 902 Ref E).

The earmarked waste and storage area falls outside of the red line application boundary as stipulated on the submitted Site Location Plan (105_PL2_S_01 Rev B).

The designated locked and secured site compound area is shown proposed in an area currently occupied by x15 residential parking spaces attributed to the existing occupied flats. The plan depicts only x9 of these spaces being relocated around the site.

Seven of these relocated spaces are shown directly adjacent to Kendrick Close. We have already established that there is insufficient distance here to accommodate 2.5m x 5m spaces

without reducing the clear width of Kendrick Close to the detriment of both the site and its shared users.

The plan is also reliant on four other spaces shown directly adjacent to Kendrick Close being classed as existing spaces. They are not. The site does not have any planning permission permitting the area north of Kendrick Close for use as existing residential parking spaces.

The plan makes it clear there will be no allowance or provision for disabled spaces or EV charging spaces during construction, the latter of which two spaces should already have been implemented as part of the current planning permission.

The plan makes no allowance or parking provision for site workers or construction operatives associated with the anticipated minimum nine-month long development.

The plan depicts new lockable double site gates that would restrict a Council Waste Vehicle from successfully completing the turning manoeuvre presenting within the submitted Transport Statement swept paths.