

PLANNING REF : 251621
PROPERTY ADDRESS : 18 Park Road
: Wokingham, Berkshire
: RG40 2AH
SUBMITTED BY : Mrs Louise Spencer
DATE SUBMITTED : 06/09/2026

COMMENTS:

I wish to register my objection to this planning application, following the submission of further documents on the planning portal - about which none of the local residents were informed.

Fundamental flaws in the proposed car-free development

The development is intended to be 'car free' with only 2 Blue Badge residents parking spaces on the site and no other residents parking. The applicant's own documents demonstrate that the proposal will not genuinely be car-free, but instead seeks to manage likely resident vehicle ownership through tenancy controls and post-occupation monitoring.

The Residential Travel Plan states that the development will have "zero private residents car usage" and that the target for car-driver trips will remain at 0% "in perpetuity.

However, the Framework Parking Management Plan simultaneously:

- requires residents to notify the management company if they acquire a vehicle;
- contemplates residents who "genuinely require a vehicle";
- directs such residents towards town centre parking facilities;
- provides an enforcement process for parking infringements; and
- provides procedures for investigating reports of resident parking on nearby roads

These measures would only be necessary if the applicant accepts that some residents are likely to own vehicles. The proposed management regime therefore appears inconsistent with the assumption of zero resident car ownership on which the development is based.

Furthermore, the TPS is aimed at 'encouraging sustainable travel behaviour, so that single occupancy car use can be reduced' - this acknowledges that car use can only be reduced, not that it can be eliminated.

The likelihood of residents owning cars is supported by the latest census data. This shows that at the time of the census in 2021, 90.9% of households in Wokingham had access to at least one car or van and 53.5% of households had two or more vehicles. This makes Wokingham one of the most car-dependent and high-car-ownership areas in England, with a much lower proportion of car-free households than the national average.

The plans assume that a high level of residents will use a cycle as their main mode of transport - with the travel plan showing this to be between 75% and 80% split across cycling and walking (the expected split between these modes is not stated in the plan). It assumes that there will be 0% driving and 15% - 8% car pick up. The plans do not include any provision for drop off/pick up parking. Census 2021 data showed that 4% of employed Wokingham residents walk to work, 1.3% cycle, 1.5% of employed residents travelled to work by train and 1.5% by bus. This compares with over 39% travelling by car either as a driver or passenger. These figures indicate that private car ownership remains the dominant travel choice within the borough. It is therefore unreasonable to assume that a significant proportion of future occupiers will forgo car ownership entirely. As

a result, the proposal's reliance on a car-free model, supported primarily by tenancy restrictions and alternative modes of transport, is therefore not reflective of established local travel behaviour and risks generating overspill parking demand on surrounding roads.

The details laid out in the plans to ensure and enforce the car free requirement are weak. The TP acknowledges that 'the actual details of the TP cannot be finalised at this stage, as much will depend on the initial travel choices made by the residents of the site' but states that if variations occur, the strategy will be to ensure that the development has 'no car-related traffic demand from residents', which is unrealistic given the data and evidence outlined above - and contradicts the plan's assumption that 15% - 8% of residents will rely on car passenger journeys.

The applicant places considerable reliance on the marketing, allocation and management of the development as a means of maintaining its car-free status. However, the submitted documentation does not demonstrate that the absence of parking or the prohibition of vehicle ownership will be secured through legally binding tenancy provisions. In the absence of such safeguards, there is no certainty that future occupiers will remain car-free. This is a fundamental concern because the transport and parking assessments are predicated on the assumption of zero resident car ownership. If that assumption proves incorrect, no effective mechanism has been identified to prevent resulting overspill parking on surrounding roads.

The plans also state that 'residents who genuinely require a vehicle shall be directed towards existing town centre parking facilities and permit arrangements operated independently of the development', thereby acknowledging the likelihood of car ownership by residents. The nearest car parking is at Wokingham train station at a cost of 135.40 for a monthly permit. It is unrealistic to expect that residents will choose to pay this monthly fee rather than opting to park adjacent to their home in the visitors' spaces for nil cost.

If a resident acquires a car during their tenancy, the local lettings plan section states that they will be 'required to notify the management company', again acknowledging the likelihood of residents wanting and intending to own a vehicle. The plan goes on to say that 'persistent breaches may be addressed through tenancy management procedures where appropriate'.

The application relies upon tenancy management measures rather than physical parking provision. The proposed controls appear difficult to monitor and enforce in perpetuity and may cease to be effective if units are sold rather than rented. Evidence demonstrates that residents will own cars, and the plans have not demonstrated how overspill parking on to neighbouring roads and highways will be prevented.

Lack of enforceable parking controls

The proposal relies almost entirely on behavioural controls rather than physical mitigation.

The Framework Parking Management Plan proposes a number of measures,

but no evidence has been provided that these measures have been successfully used elsewhere to achieve and maintain 0% resident car ownership.

Furthermore, the Residential Travel Plan states that if targets are not met, discussions will be held with the Council to consider alternative measures and that travel-plan initiatives may be altered over time.

A significant concern is that the Framework Parking Management Plan relies on monitoring after the development has been occupied. The Plan states that a parking survey will be undertaken within three months of full occupation and that further action will only be considered if monitoring demonstrates a material increase in parking demand.

This effectively accepts that parking impacts may arise and seeks to address them retrospectively.

Planning policy requires developments to demonstrate that unacceptable impacts can be avoided before permission is granted, rather than relying on future monitoring to determine whether problems emerge. Failure to demonstrate sufficient visitor parking. No robust visitor parking assessment has been supplied demonstrating that four visitor spaces are adequate.

In particular, the proposal appears not to quantify likely demand from:

- family and friends;
 - staff working on site
 - support workers;
 - housing officers;
 - healthcare professionals;
 - social workers;
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- maintenance contractors;
 - carers;
 - deliveries;
 - emergency visits; and
 - other authorised visitors.

Without such evidence, it is impossible to conclude that visitor demand can be accommodated on-site.

The expectation lies with the building manager to enforce visitor parking provisions, however, there is no detail given on when the building manager will be on site, how this will be managed outside those hours and, importantly, what powers would the building manager have to control parking outside the application site.

Inadequate protection for neighbouring roads

The applicant acknowledges that Park Road and Albert Road are private roads and fall outside the Council's Traffic Regulation Order powers.

Despite this, the only proposed controls are:

- tenancy clauses;
- resident information;
- local lettings arrangements; and
- tenancy management action following complaints.

Given the limited visitor spaces available, overspill parking is likely to occur and no practical mechanism has been identified that would physically prevent residents or visitors from parking on surrounding roads.

The proposal therefore fails to demonstrate how parking displacement will be prevented on Park Road, Albert Road, Park Avenue; and nearby

sections of Wellington Road.

This concern is particularly important because private roads have limited enforcement mechanisms available to either the Council or local residents.

Internal inconsistencies and errors within the Travel Plan

The submitted Travel Plan contains a number of inaccuracies and inconsistencies which raise concerns about the robustness of the assessment.

Examples include:

- describing the site as being on the edge of a "City Centre" with a 'vast range of facilities' when Wokingham is not a city, nor can it be described as having a 'vast range local facilities (sic).
- stating that excellent rail accessibility makes travel by bus a viable alternative to car travel, which appears confused and internally inconsistent;
- assuming 75%-80% of journeys will be made by walking and cycling despite no local evidence being presented to support this shift away from most recent census data
- referring to a 500 car-club credit despite there being no established car-club network serving Wokingham town centre identified within the submission.

These issues call into question the reliability of the wider assumptions underpinning the transport strategy.

Parking concerns during construction phase

The length of the construction period is unclear. At 1.31, it states the 'contractor will aim to complete the project within the contract time scale of 12 months (estimate) weeks'. Later in the document, it states building will start in November 2026 and finish in September 2027 - a period of 11 months and assumes a start date of only two months away.

The number of people involved in the construction is not included in the plans, but they do state that it is 'expected that there will be no on-site contractor car parking'. The plans suggest this can be managed by the contractor encouraging travel by other means of transport, which appears unworkable and unrealistic and is highly likely to lead to overspill parking in surrounding roads.

For these reasons, I do not believe the applicant has demonstrated that this development can successfully operate as a car-free scheme. The proposal relies heavily on unenforceable behavioural controls, post-occupation monitoring and management interventions rather than providing sufficient parking or robust mitigation from the outset. The submitted documents fail to demonstrate how overspill parking will be prevented, particularly given the acknowledged limitations of enforcement on nearby private roads. I therefore respectfully request that the application be refused.