

PLANNING REF : 251621
PROPERTY ADDRESS : 10 Park Avenue
:
: RG40 2AJ
SUBMITTED BY : Mr Mark Sanders
DATE SUBMITTED : 28/08/2025

COMMENTS:

I am sending this again because the submission I sent yesterday says it cannot be opened.

Whilst I support the provision of additional housing in Wokingham and the provision of affordable housing, this should though be done sympathetically as regards surroundings, character and heritage and without lost amenity; this proposed development does not do that. In addition, it is not in accordance with Council's own guidelines for planning.

1.Design, appearance and materials

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

The proposed development contains no sense of the heritage character of existing buildings surrounding it, apart from using brick.

The application says 'The 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 design being conscious of key views and side elevations are likely to be important and visible' The cues from Elms Field appear to be used as a convenient way to justify the massing of the design, rather than relevance. Cues should be taken from existing residential properties which more immediately surround the proposed development. These properties are more traditional and two storeys.

For the proposed development:

The reference to 3 storeys is a limit, not a target. The site is surrounded by properties that are ground floor and first floor only. The development should be likewise. It is not consistent with or

sympathetic to the properties surrounding it in Park Road, Station Road and Wellington Road.

Flats 20 and 21 cause the development to be three storeys in Park Road. There is no precedent for three storeys in Park Road. 9.3 Urban Form para 9.3.1 of the Wokingham Town Centre Masterplan (WTCM), (see more later), refers to protection of the building line of historic streets and spaces. The development is in front of the

building line along Wellington Road and has no garden space, so is counter to the WTCM.

3A.2.6 of the Borough Design Guide (BDG)says "Most projects will need to include consultations with interested local people to find out what they feel is important, or how the proposals could help to improve the area. Initial consultation should take place at the stage when

there is an initial appraisal and some conclusions have been drawn, so that these can form the basis of discussion". The local residents have not been consulted in such a way for the application.

Para 3A.4, sub para 2, of the BDG says "Do the proposals create a sense of place that contributes positively and appropriately towards local character in terms of urban design, architecture, landscape and public realm qualities? Is there an assessment of local character that demonstrates the applicant's understanding and shows how the proposals retain or enhance it?" R11 on page 40 says likewise. The proposed development is out of character with its surrounding buildings and does none of this.

Page 50 of the BDG says that minimum internal standards will be adopted as part of the MDD Local Plan. These minimum standards are taken from the London Housing Design Guide (LHDG). The application shows these minima in the Design & Access Plan, and quote the LHDG area for reference, comparing these with actual areas in the plans. 15 of the 21 flats do not meet the 'best practice' minimum of 55 square meters. The 50 square meters in the BDG (from 2010) looks out of date, certainly as regards best practice.

I object to the application on this because cues are being taken from relatively remote recent developments and do not follow those surrounding the site, namely:

- Not traditional design
- No consultation with local stakeholders
- Monotone
- Not ground and single storey only.
- Materials, massing, key views and side elevations are not conscious of the local character which is contrary to the Masterplan and CD13.0 3 Borough Design Guide. This is particularly demonstrated by the 'View from Park Road' page in the plans
- Best practice not followed for minimum area for all flats

2. Overdevelopment, massing and visual amenity
The proposed development is significantly larger than and different style from existing Park Road properties which are detached Victorian/Edwardian houses with ample parking spaces on the site of the houses. Any development on Park Road, like that of the applicant's, should do likewise. The development as is out of character with the road, and not just Park Road but Wellington Road and Station Road also.

Stepping down in the application is at what must be some 20 meters in to Park Road. It may be argued this is a landmark site, para 9.5.1 of the WTCM, but only that part facing the station, it is far too visually dominant for facing a cul-de-sac of low-rise Victorian/Edwardian properties in Park Road.

Para 9.5.1 of the WTCM states that landmarks are identified in Figure 41 of the WTCM, however there is nothing in the key to Fig. 41 (which identifies 12 other types of markings on the map) stating how a 'landmark' can be identified on the map. There is no evidence

therefore from Fig. 41 that this is a landmark site.

At 9.3 Urban Form para 9.3.1 of the WTCM says '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'

Para 3A.4, sub para 11, of the BDG says "Is the building's height, bulk and massing, and roof form, designed to relate well to the local context?". It does not.

Para 3A.4, sub para 16, of the BDG says "Have neighbours, the local community and other stakeholders been engaged with the process of

paring the proposals and does the scheme respond to the issues raised?". There has been no such engagement.

Para 4.13, sub para 11 of the BDG says "Does the proposed density lead to a scheme that relates well to the character and form of the local area taking into account the height, bulk and massing of buildings, the spaces and gaps around them, and the area required for parking? The density, character, height and massing are nothing like the surroundings.

Existing properties in Station Road, Wellington Road and Park Road (SRWRPR) are 2 storeys so by building 3 storeys, does not protect the building line of historic streets and spaces.

Park Road, Wellington Road and Station Road residential properties are set back with garden space. The plans, best seen from the 'Plan' view, show that along Wellington Road the development is in front of the building line, thus not following the design guide to protect the building line of historic streets and spaces.

The east elevation does not show Wellington Road properties on the other side of Park Road. Thus the reality of the massing is not made apparent from that elevation.

The "View form Park Road" page of the plan shows the massing of the proposed development, which is out of character.

For these reasons I therefore object to the overdevelopment, massing, out of character visual amenity and deviations from the design guide. The development should be 2 storey (ground and first floor) throughout.

3. Adequacy of parking

The Wokingham Town Centre Masterplan says that 'the reduction of car movement and parking is a long-term aim of the Council. Paragraphs 7.4.6 of that plan says 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' (my emphasis).

This is well meaning but a reduction to zero on one development is excessive and will cause problems.

Paragraph 10.6.11 of the WTCM states that parking at new housing developments will, on a District-wide basis, average 1.5 spaces per dwelling in line with the advice contained in PPG3 Housing. Planning permission will be monitored to ensure this average is being achieved.

Paragraph 10.6.12 of the WTCM says 'new housing developments in sustainable locations with access to average or better public transport services (see paragraph A8.4.3 below) will be expected to provide less than the maximum'. 'Less than maximum' being concluded as zero for 21 units is unrealistic. 'Para A8.4.3 below' could not be found.

The application's premise is that parking spaces are not needed because of the location of the site and availability of public transport. Regarding public transport:

- 3.2.9 of the WTCM says 'frequency and usage of public transport are major issues. Currently, public transport usage is 5% lower than

the national average. Services to and from Finchampstead are very limited. There is currently no service between Lower Earley and Wokingham and services from Woodley are very limited. Existing services,

Arborfield, Arborfield Cross, Barkham Ride, Woosehill, Emmbrook, Twyford and Sonning are infrequent, with only one hourly service'.

- 3.2.10 of the WTCM says 'frequency of these services is particularly poor in the evening and at weekends, reducing access to and demand for town centre services at these times'.

- 3.2.11 of the WTCM says 'Importantly, at peak times, when bus services can assist in relieving congestion within the town centre, there are very few bus priority measures along routes into the town centre.

- Para 3A.4, sub para 9, of the BDG says "Are parking and servicing areas appropriate in size and location, laid out and designed satisfactorily for their users, and with a positive character, so that they create a high-quality setting for development, while minimising any impact on the safety of the public realm? There is no parking, so this is not achieved.

- Para 6.1 on page 72 of the BDG says "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" and provides examples. It also says that "Suitable parking areas should also be provided for cycles, motorcycles and disabled badge holders." It does not say for cycles, motorcycles, disabled badge holders and visitors only, which is the plans proposal.

Para 4.13, sub para 4, of the BDG says "Does the scheme accommodate cars, without them dominating the layout or street scene?". There is an expectation of cars, but this plan accommodates no cars. The table below is taken from Appendix 2 (page 129) of the Wokingham Borough Development Plan.

The provision of no parking for 21 units is way outside the figures in this grid. For 21 1- & 2-bedroom flats rented, parking space provision should be at least in the upper teens.

The planning committee minutes for the application 200700 on the 'Jewson' site across the railway line from this proposal says concern was expressed "regarding parking and questioned the impact on the surrounding area". The response is recorded as "that the parking would be unallocated. There was a requirement for thirteen spaces and the applicant would be providing fourteen parking spaces. The area in the vicinity had heavy parking restrictions so she would not anticipate overspill into these areas. Visitors could make use of nearby car parks such as at the station".

This application 251621 says that there will be no car parking spaces provided for the residents. This appears to be justified by the applicant by saying the location by the railway station and the town centre with access to buses means the site has good public transport links.

The committee expressed concern at a ratio of parking spaces to units of 1:1 being insufficient (13 minimum, upped to 14, for 14 units), so the current plan for no spaces for 21 units is completely contrary to this.

The planning application refers to bus routes 121,125,125A,125B,145,93 and 3 Leopard but does not go into the quantity or regularity of the services. Looking these up and summarising them reveals the following:

- 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.

- 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. The others are no better. These timetables do not evidence that public bus services have overall improved since the position summarised in paras 3.2.9, 3.2.10 and 3.2.11 of the WTCM from 2010 to which I referred earlier.

These public transport services do not meet the criterion of offering public transport to provide 'comparative door-to-door journey times' (ref. paragraph 7.4.6 of WTCM), particularly when waiting times are included and also probably some delays and cancellations. The services are insufficiently dense, wide ranging or frequent in geographical coverage.

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 existing 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 provide 'comparative door-to-door journey times'.

Existing residents do at least have driveways and/or road space in front of their house to park.

There is no reason to believe residents of the proposed development will not likewise need cars.

7.5.2 of WTCM refers to 'Demand Management' in the context of transport capacity. Reducing the supply of parking spaces to zero is not 'Demand Management' it is 'Supply Management'. The development will create car parking overspill.

Paragraph 3.1.14 of the planning application's Transport Statement states 'Park Road itself provides very little in the way of on street car parking opportunities which will discourage car ownership'. This is pure speculation and not supported by local evidence.

The existing residents of Park Road and Park Avenue are constantly finding cars parked which have no connection with any residents, let alone any that might spill from the proposed development. Quite contrary to the statement in 3.1.14, based on the years of experience of the existing residents, any prospective residents of the new

development will see Park Road (PR) and Park Avenue (PA) as the perfect places to park their car. The PR and PA are 10m wide, so wider than 7.3m for a public road, meaning cars owned by residents of the new development will simply park along PR and PA.

How will the double yellow lines on the plans on Park Road be enforced if the road is only made up to adoptable standards. The road has to be adopted as well.

CC07, of the Wokingham Borough Development Plan, page 18, says planning permission will only be granted where the proposal demonstrates that the new scheme retains an appropriate overall level of off-street parking. Para 2.53 (page 19) goes on to say "Development proposals shall retain an appropriate overall level of off-street parking to avoid any unacceptable impact on on-street parking conditions."

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

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 (i.e. proximity to town centre and public transport) as Wokingham Borough Council is putting forward in this planning application were used by Slough Borough Council 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. The viability expressed in paragraph 2.6.7 of the applicants Transport Statement "The site benefits from excellent rail accessibility, making travel by bus a very viable alternative to private car journeys" appears confused in so far as it suggests rail accessibility makes bus travel viable. Interpreting the spirit of what it might be trying to say, such vicinity to rail/bus stops does not stop car ownership for the reasons already stated. Regrettably the availability of such nearby public transport links does not mean all residents will have no private car. The "car free development" concept is a non-starter.

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 and how would that be enforced?

I therefore object to the development providing no car parking spaces because:

- The public transport is inadequate to provide 'comparative door to door journey times' when compared with a car
- The spaces per unit do not align with Borough design and guide standards. There is no accommodation for cars.
- Existing residents in the area own cars. To be believe otherwise for new residents is a fallacy.
- Existing properties in the area have their own on-site parking which sets a precedent
- Provision of no car parking spaces will lead to overspill in to local roads, mainly PR and PA because they are closest and unadopted. Being unadopted, no yellow lines.

- No thought is given to the prospect of parking overspill cost for existing PR & PA residents.
- No thought is given to preventing residents of the proposed development contributing to costs or being legally prevented, with enforced consequences if they do, from parking in local roads, particularly PR and PA.
- There should be a parking space per unit, consistent with application 200700.

4. Adequacy of loading/turning

Refuse bins are at the entrance to the service yard. That entrance is also access for the Station Furniture business. Refuse collection and furniture delivery require sizeable vehicles. Is there place for such vehicles to turn? If not, I object to the development's geographical layout.

5. Noise and/or disturbance/overlooking/overshadowing/loss of amenity and quality of life impact on neighbours

The much higher density of the housing on the development site compared with its immediate surroundings will lead to additional disturbance. I have been unable to access any report about overshadowing of existing properties by the proposed three storey building. Can this be provided/identified.

More specifically I object because:

- The development will have an extremely negative impact on quality of life of its neighbours due to overlooking, causing a loss of light and as a consequence of activity in 21 new homes, a number not much less than the number of homes along the whole length of Park Road and Park Avenue.
- 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, this will result in nuisance parking outside existing residents' properties.

6. Traffic generation/Highway Safety/Road access

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.

- 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. - The proposed disabled parking spaces on Park Road will increase congestion towards the junction and increase the risk of an accident. - Likely overspill parking will be detrimental to highway safety. It is a fallacy to assume overspill parking will not take place.

- 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.

Highway Maintenance - objection on the basis that the construction of the proposed development

will damage Park Road that has been paid for by existing residents and there is no forward provision

for its ongoing maintenance in the proposal:

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'.

After construction

The planning application states that the first section of Park Road will be "finished to adoptable standards" (see the proposed site plan. It does not say 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. That section 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 residents and visitors to the Council's development.

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.

7.Noise, smells and fumes

Why is a coffee van included in some of the drawings. The plan view shows it, but the south elevation does not. An inconsistency - which one is correct? Why is a coffee van in some of the plans anyway? Who would this attract to the site? What would its hours of operation

be?

8.Capacity of local infrastructure

As detailed earlier, buses/trains do not provide 'comparative door-to-door journey times' as explained in my objection to the application's absence of parking provision.

Regarding water supply, this is a large percentage increase in housing units for the area. 21 washing machines, 21 baths/showers/toilets etc. Water pressure will need to be increased to cater for that. Burst pipe chances will thus increase.

9.Landscaping

The south elevation plan appears to show trees where the disabled spaces are shown on the plan view. An inconsistency.

Park Road, Wellington Road and Station Road residential properties are set back with garden space. The proposed development does not, so is out of character.

10.Community and social facilities.

How will affordable status be maintained. Will any residents all be tenants with a social landlord forever?

11.Wild life and ecological impacts/Loss of trees

There is a significant and well-established poplar tree on the site. As per the 'proposed site plan' the proposal is that a mature tree, that has a TPO on it, is removed; the proposed replacements are a poor substitute. 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?

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).

12.Probity in Planning

The Local Government Association's 'Probity in Planning' guidance says "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 raise this because:

1. The council owns the land on which the development is proposed, but parts of the applicant's name are redacted.
2. The Transport Statement in the application states the dates in 2025 and 2026 for demolition of existing and construction of the

development.

3. WBC's 'Residents' Round Up' email update of 8 August: "A transformative new housing development is set (my emphasis) to be built in Wokingham town centre, providing 21 high-quality, affordable homes for residents." Only in the third paragraph is reference made to the planning application being submitted.

4. In the WBC 'Infrastructure News' email of 20 August it says "A transformative new housing development is set to be built in Wokingham town centre, providing 21 high-quality, affordable homes for residents." And "This represents a significant investment in affordable housing and will (my emphasis) be near the junction with Wellington Road and Station Road. Again 'is set' and also this time 'will'. Only following paragraphs refer to the planning application.

5. On the front page of "Wokingham Today" published 21 August, a resident expresses concerns about the TPO on the site of the application. The article says Wokingham Borough Council were approached for comment, but it declined citing that it does not comment on live planning applications; how does WBC reconcile that with their 8 and 20 August emails above, article in 14 August 'Wokingham Today' and posts on social media.

3-5 above etc may be badged as publicity, but unfortunately prioritise the message it is/will be happening and not that now is the opportunity to comment on the planning application. Not everyone is on

electronic media. A 'site notice' was conspicuous by its absence and would seem a simple additional and inexpensive exercise to raise awareness, the site being no more than about 300 yards from the WBC Shute End offices.

I trust that this application will be considered impartially despite the landowner, the Council, appearing to pre-empt the planning decision.

Summary & conclusion

These plans are in many areas counter to the Council's adopted planning policies on parking, design, amenity, massing along with other matters raised here and represents overdevelopment of the plot. The development is for the long term and needs to be right.

The

applicant needs to consult more with stakeholders. If permission is granted, that is it, if not, a better solution can be worked through by stakeholders. This is a WBC application so, if permitted when so many WBC design guidelines have not been followed, sets a dreadful precedent for all future applications, borough wide.

I therefore respectfully ask that this application be refused.