

PLANNING REF : 251621
PROPERTY ADDRESS : 10
: 10 Park Avenue, Wokingham
: RG40 2AJ
SUBMITTED BY : Mr Mark Sanders
DATE SUBMITTED : 01/09/2026

COMMENTS:

Framework Parking Management Plan

Whilst this is welcome as a recognition of the problem it falls down because it has no objective measures of breaches or obligation to enforce defined sanctions against breaches within a fixed time frame. The purpose of the plan says in its opening bullet points on the first page descriptions such as:

"support the effective operation . as a car-free scheme" "minimise the likelihood of parking displacement"

"provide a proportionate mechanism"

"identify measures that mat be implemented"

These are all soft words and do not carry the force of the law, with time deadlines, which usual parking enforcement carries, such as yellow lines or time restrictions.

Using the Plan's headings:

Parking Allocation

It is questionable whether the "four + two" parking spaces provided is sufficient for visitors. The proposed use for the development for "care leavers, vulnerable adults and other residents whose housing needs align with a car-free lifestyle" (see "Local Lettings Plan"

section for that quote) means carers/social workers will visit and their length of stay, frequency of visits, number of visits for 21 units has to bring in to question the sufficiency of four spaces. There will be other visitors too and the chances of all residents in 21 units (more than 21 people) not needing a car is remote. No feasibility study is in evidence - there should be one.

Blue Badge Spaces

This includes "should future demand for accessible parking exceed the initial provision, the Management Company may consider converting one or more of the visitor spaces to accessible use, providing this does not contribute to wider parking impacts". Changing to e.g. "three + three" in place of "two + four" (see above) does not remove the problem from the site it just moves it within the site, overspill remains. Not a solution.

Management Roles and Responsibilities

This says "The company or freeholder shall provide residents with clear contact details for reporting any parking-related concerns". The residents of Park Road, Park Avenue and Albert Road (PR, PA, AR) need an equivalent contact point so that should be added in.

Local Lettings Plan

This states the Plan "shall seek to prioritise applicants whose circumstances are compatible with the car-free nature of the scheme. "Seek" carries no obligation to guarantee. What about when the circumstances of residents change e.g. care leavers becoming 25 years old.

Tenancy Controls

This specifically identifies "Park Road or other nearby private roads". Residents of the proposed development may not know which roads nearby are private so they should be named in the plan for the

avoidance of doubt. Park Avenue and Albert Road should be added here specifically, and the words "other nearby private roads" should remain. The first bullet point indicates that the applicant realises how unlikely it is that this development will really be car free.

Final bullet point says

"Persistent breaches may be addressed through tenancy management procedures where appropriate". Different people will perceive the word "Persistent" differently and has no objective measure accompanying it. The word "may" carries no obligation. Similarly different people will perceive the words "where appropriate" differently because it carries no measurable threshold or obligation. The bullet point is too open to interpretation.

Enforcement Process

"Any inappropriate" presumably means "outside of the parking regulations for the site and tenancy agreement".

Inappropriate means different things to different people. No objective measure. Then it goes on "Measures may include". Again, the word "may" - it carries no obligation.

What are the sanctions to be imposed on residents who breach the Management Plan? Enforcement should carry the force of law e.g., but not necessarily exclusively, via tenancy agreements.

Specific Measures Relating to Park Road and Albert Road

This heading needs to add in Park Avenue to read "Specific Measures Relating to Park Road, Park Avenue and Albert Road".

Similarly, the opening sentence should add in Park Avenue.

The section states the management of PR, PA, AR "remains a matter for the respective owners and occupiers". Why does the applicant think

that they are entitled to push enforcement administration and cost on to existing local residents as a consequence of their inability to provide on-site parking. Every other residence in this area provides one or more parking spaces per housing unit on its site - this

development should be no different. The non-provision of parking is not in accordance with the Local Design Guide which I have already cited in my objections of August & September 2025. This demonstrates one of the many reasons (see my 2025 objections) why this development is excessive for the site.

The plan says "To minimise the likelihood of development-related parking on these roads". Minimise" is how little? The plan needs to "prevent" not "minimise".

The plan says "The management company shall investigate any substantiated reports of resident parking on private roads and take appropriate tenancy management action where justified".

As with the word "Persistent" above, different people will perceive the word "Justified" - it carries no objective measure against which to enforce.

There should be an independent appeals procedure for the residents of PR, PA and AR.

Monitoring

The plan says "Such investigations may include". Again, no objective

obligation, only "may".

The plan says "A parking survey shall be undertaken within 3 months of full occupation of the development." Parking infringements may occur before full occupation. This should not be an excuse to not take enforcement action from day 1 of the first unit being occupied.

Assessment of Parking Impacts

The plan talks about "a material increase in parking demand". How much is material - the plan needs objective measure. 5% would usually be regarded as material.

The bullet pointed measures to be taken are general only. What is the acronym TRO in full? Why place a financial limit on it?

Conclusion

The Framework Parking Management Plan has no teeth whatsoever. Its commitment is no more than "support", "minimise" "may", "if appropriate", "if justified", "seek". It has no objective measures, no certainty of enforcement, no time deadlines for action and no imposed sanctions against breach.

What enforcement actions will the management really take? If action does not 'hurt' and/or have the force of law on the tenant then there is no certainty it will be effective. Are they going to be evicting tenants (to where?) for parking where they should not, tow their car away (to where) thereby perhaps depriving them of their livelihood, issuing financial penalties or implementing sanctions sufficient to change behaviour? Assuming Wokingham Borough Council Social Services have placed a resident, what would they say about such enforcement action. WBC would appear to have a conflict of interest here. If enforcement action does not "hurt", then there is no certainty

behaviour will change. How is this plan going to work in real life?

The proposed use by care leavers and vulnerable adults will include people who are looking for independence and a job. They will likely need a car for that. Such people can often obtain grants for cars due to their needs and the cars can be larger than average to cater for those needs. Their circumstances may change from not needing a car to needing one.

It seems perverse that a housing development for people in challenging circumstances is giving them an additional challenge of finding a parking space.

The management need to be and be perceived to be acting with probity. It is not known who the management are - without that, probity is not possible. To whom would management be accountable? What would an appeals procedure look like for surrounding residents?

The initial premise of the development was that there will be no cars, but this plan admits that is a non-viable premise. In the absence of sufficient on-site parking the plan's solution is to pass the parking problem on to the residents of PR, PA and AR as admitted in the plan's wording that enforcement actions against unauthorised parking on those roads "remains a matter for the respective owners and occupiers". No - a proposed development needs to accommodate the parking it creates itself, not push the problem on to existing residents with resultant administration, cost and lost amenity. It is a report with many words but allows management to consider breaches, ponder indefinitely but then take no action.

The problem is that the proposal is an overdevelopment of the site and completely out of character with its surroundings and that is

what needs addressing by the applicant.

From a planning application administration perspective, the residents of the three private roads referred to in these parking plans should have been directly notified of the additional planning documents. Park Road, Park Avenue & Albert Road are only 5 minutes' walk from Council's Shute End offices - a leaflet drop for example would have been easy.

I object to the Parking Management Plan because it identifies problems but there is no objective measure of what parking breaches will be, no obligation to enforce it with forceful consequences on the offender within any set time frame and there is no independent appeal process for PR, PA & AR residents. Without this, increased parking will negatively impact amenity of local private roads.

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Construction Management Plan

Para 1.3.1. Is the timescale 12 weeks or 12 months?

2.2 A condition survey should include Park Road.

2.3 From a probity perspective the phasing is presumably conditional on, and does not pre-judge, planning permission being granted.

2.7.1 identifies that 8 Wheel Tipper trucks & HGV deliveries and others will be visiting the site. Paras 2.1.5 and 2.6.3 state that vehicles entering and leaving the site will do so in forward gear and that reversing in or out of the site is prohibited. Is there space for such vehicles to turn inside the site throughout any development process?

2.9. Travel Planning. The plan needs to prohibit contactors and staff from parking in PR, PA and AR, particularly in light of 2.11 which states there is to be no on-site parking.

Conclusion

This is largely internal to the site but 2.2 and 2.9 particularly can impact existing local residents so need addressing.

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Residential Travel Plan

Para 1.3.1 - refers to "minimise" again just as in the Framework Parking Management Plan. Not objectively measured or legally enforceable, so toothless.

Para 2.3.4 - the start point at Park Road may be well located to minimise/eliminate the need to travel by car but the same cannot reliably be said for the journey destination. The Design Guide says that the journey by public transport should be 'comparative door-to-door journey times' (ref. paragraph 7.4.6 of Wokingham Town Centre Masterplan (WTCM)), as by private car; that is not the case, as evidenced by most if not all existing residential units in the area having a car. The location does not minimise/eliminate the need to travel by car, demonstrated by the current facts. The sentence 2.3.4 is fallacious. Commentary in paras 2.4 and 2.5 about pedestrians and cycle access does not, due to its radial limits, solve this need for a car.

2.6 Public Transport Services. 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. See my comments from my objection submitted 28 August 2025.

Para 3.1.1.- refers to "minimise" again just as in the Framework Parking Management Plan. Not objectively measured or legally enforceable so toothless.
3.1.5 - benefits are listed. Disadvantages such as increased journey times are not mentioned.
4.1.2 - these largely deal with local journeys in town and do not address longer journey to which the measures cannot be applied.
4.1.4 - promoting zero parking. "Promote" carries no objective measure or substantive commitment.

The travel plan promotes how a resident can live without a car, but once outside a radius of around 2km the 'comparative door-to-door journey times' cannot be supported and a car will be needed.

Conclusion

Outside of a radius of 1-2 km the plan does not satisfy the requirement of paragraph 7.4.6 of WTCM of 'comparative door-to-door journey times' for public transport when benchmarked against using a private car, so I object to it on that basis.

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= plan needs to be adopted by the Council with double yellow line enforcement.

On all these management plans and site plan, my previous comments from 28 August & 4 September 2025 and 17 August 2026 still apply.