

PLANNING REF : 261582
PROPERTY ADDRESS : 2 Lakeside
: Reading, County (Optional)
: RG6 7PQ
SUBMITTED BY : Mr Adrian Collett
DATE SUBMITTED : 20/07/2026

COMMENTS:

DRAFT OBJECTION LETTER

Planning Application - 192 Silverdale Road, Earley, RG6 7NB

Proposed Subdivision of Existing Dwelling into Two Separate

Dwellings Dear Planning Officer,

I wish to formally object to the above planning application. Having reviewed the submitted plans, Design and Access Statement, Community Involvement Statement and having considered Wokingham Borough Council's previous decisions relating to similar subdivision proposals, I believe the application fails to demonstrate compliance with the development plan and would result in an overdeveloped, cramped and unsatisfactory form of development.

Whilst I recognise that the site lies within the settlement boundary of Earley and that residential development may be acceptable in principle, that does not remove the requirement for the proposal to satisfy all other development plan policies relating to design quality, residential amenity, parking, landscape character and sustainable development. Wokingham officers have repeatedly made this point when assessing subdivision proposals.

1. Overdevelopment of the Site

The proposal seeks to create two independent dwellings from a property which was designed, approved and built as a single family dwelling. In doing so the site is expected to accommodate:

- Two separate dwellings;
- Three parking spaces;
- EV charging infrastructure;
- Two sets of refuse and recycling facilities;
- Cycle storage;
- Separate access arrangements;
- New garden divisions;
- Separate private amenity areas.

The cumulative effect is a cramped and over-intensive form of development.

Wokingham Borough Council has previously refused subdivision proposals where the site was not considered capable of satisfactorily

accommodating the consequences of an additional dwelling, including parking, amenity space, access and landscaping requirements. In Application 192571 (29 Duncan Road), the Council concluded that the site was not of sufficient size and shape to accommodate the proposed development without harm to character and amenity.

The current proposal raises similar concerns.

The application therefore conflicts with Core Strategy Policies CP1, CP3 and CP5 and the design objectives of the National Planning Policy Framework (NPPF).

2. Failure to Demonstrate Adequate and Usable Amenity Space

The applicant repeatedly asserts that adequate amenity space is provided but has submitted no meaningful assessment of:

- Garden usability;
- Privacy;
- Sunlight;
- Amenity space calculations;

- Compliance with the Borough Design Guide.

Wokingham's Borough Design Guide requires private gardens to be:

- Usable;
- Capable of sitting out;
- Capable of play and recreation;
- Capable of clothes drying;
- Benefiting from privacy;

- Accessible and functional.

Officer reports relating to Langborough Road, Elm Road and Church Road demonstrate that garden quality, privacy and usability are critical considerations when determining subdivision applications. Of particular concern is House 2.

Although a garden area is shown, part of the identified amenity provision relies upon a patio area located on an exposed corner position adjacent to the public realm. This area lacks the privacy expected of a private garden and cannot reasonably be regarded as equivalent to a conventional rear garden.

Unlike previously approved subdivision proposals, no evidence has been submitted demonstrating:

- Direct sunlight availability;
- Garden depth compliance;
- Privacy levels;
- Usability of the proposed outdoor space.

The proposal therefore fails to demonstrate compliance with Policy CP3, Policy TB07 and the Borough Design Guide SPD.

3. Parking Provision Has Not Been Properly Demonstrated

The application claims that three parking spaces satisfy Council standards.

However, unlike other approved subdivision schemes assessed by Wokingham Borough Council, the submitted plans do not provide adequate dimensional evidence demonstrating compliance with adopted parking standards.

In particular, the application fails to demonstrate:

- Bay widths;
- Bay lengths;
- Vehicle manoeuvring arrangements;
- Independent accessibility of spaces;
- Visibility requirements associated with the prominent corner location.

The plans simply identify parking spaces without demonstrating that they are fully compliant and usable.

The Council should require the applicant to provide dimensioned parking layouts and vehicle tracking information before reaching a decision.

The proposal therefore fails to adequately demonstrate compliance with Policy CC07 and the Borough Design Guide.

4. The Likely Occupancy of House 2 Has Been Understated

The proposal describes House 2 as a one-bedroom dwelling. However, the plans include an additional study room of approximately 6.5m in addition to the principal bedroom.

While labelled as a study, this room is capable of functioning as:

- A nursery;
- A guest bedroom;
- Sleeping accommodation;
- An additional habitable room.

This raises concerns that both the occupancy level and parking demand associated with House 2 have been understated. The Council should consider the likely real-world use of the dwelling rather than relying solely on the room labels shown on the plans.

5. Poor Quality Living Conditions and Lack of Acoustic Information
Wokingham Borough Council's own Environmental Health comments in previous subdivision applications have highlighted the importance of sound insulation and acoustic separation when converting single dwellings into multiple residential units.

The current application contains:

- No acoustic assessment;
- No sound insulation strategy;
- No details of upgraded separating construction;
- No information regarding noise transmission through floors, ceilings and services.

No evidence has therefore been provided that satisfactory living conditions can be achieved for future occupiers.

This is particularly concerning because subdivision of an existing dwelling often creates significantly different acoustic conditions compared with a purpose-built residential building.

6. Space Standards Have Not Been Properly Demonstrated

The applicant relies upon floor area calculations to claim compliance with Nationally Described Space Standards.

However, these figures appear to be based upon existing floor areas rather than the final built conversion.

No evidence has been provided to demonstrate that compliance will be maintained once:

- Fire separation measures;
- Acoustic separation measures;
- Additional service installations;
- Utility enclosures;
- Building Regulation upgrades

have been incorporated into the completed development.

The Council cannot therefore be satisfied that the finished dwellings will continue to satisfy Policy TB07.

7. Loss of Corner Plot Character and Urbanisation of the Site
The application site occupies a prominent corner position.

Corner plots make an important contribution to the openness and spaciousness of a residential area.

The proposal introduces:

- Additional parking;
- Additional hardstanding;
- Additional household paraphernalia;
- Cycle stores;
- Bin stores;
- New fencing;
- Additional access arrangements.

This results in a noticeably more urbanised and cluttered form of development.

Previous Wokingham refusals have confirmed that the loss of openness, erosion of landscaping and excessive hardstanding can justify refusal where development harms the character of the area.

The proposal therefore conflicts with Policies CP3, CC03 and TB21.

8. Sustainable Construction and Policy CC04

The Design and Access Statement provides almost no meaningful information regarding sustainable construction.

The application does not adequately address:

- Energy efficiency;
- Carbon reduction;
- Fabric improvements;
- Renewable energy opportunities;
- Sustainable construction requirements.

The creation of a new dwelling should be accompanied by appropriate evidence demonstrating compliance with Policy CC04 and the Sustainable Design and Construction SPD.

No such information appears to have been provided.

9. Sustainable Drainage and Surface Water

The proposal includes additional parking areas, hard surfaces and external works.

Whilst reference is made to permeable and impermeable areas, insufficient information has been submitted to demonstrate compliance with Policy CC10.

Previous Wokingham refusals have highlighted the importance of properly assessing the impact of hardstanding and impermeable surfacing on drainage performance.

The Council should be satisfied that the proposed subdivision will not increase surface water runoff or adversely affect drainage conditions.

10. Thames Basin Heaths SPA

The applicant acknowledges that the site is located approximately 3.5 km from the Thames Basin Heaths SPA.

Previous Wokingham decisions make clear that development resulting in a net increase in dwellings requires appropriate mitigation through SANG and SAMM contributions, secured through the appropriate legal mechanism.

The submission merely indicates a willingness to make contributions if required.

The Council should confirm that all SPA mitigation requirements have been properly secured before any determination is made.

11. Inaccuracies Within the Submitted Documentation

The Design and Access Statement contains numerous inconsistencies, including references to:

- The dwelling being both detached and semi-detached;
- References to flats despite the proposal relating to houses;
- Generic text that appears to have been imported from unrelated applications.

These errors undermine confidence in the accuracy of the submitted assessment.

12. Community Involvement Statement

The Community Involvement Statement asserts that neighbouring residents were consulted and that support was expressed for the proposal.

As directly affected neighbouring residents, no consultation was undertaken with us.

Whilst pre-application consultation is not mandatory for this type of proposal, little weight should be attached to a Community Involvement Statement that does not accurately reflect the position of affected residents.

Conclusion

For the reasons set out above, I respectfully request that Wokingham Borough Council refuse the application.

The proposal fails to demonstrate compliance with:

- NPPF Section 12 (Achieving Well-Designed Places);
- Core Strategy Policies CP1, CP3, CP5, CP6 and CP9;
- MDD Policies CC03, CC04, CC06, CC07, CC10, TB07 and TB21;
- Borough Design Guide SPD (including R1, R16, R17 and R18).

In particular, the application has failed to demonstrate that the site can satisfactorily accommodate two independent dwellings whilst maintaining:

- Adequate private amenity space;
- Appropriate parking arrangements;
- Acceptable living conditions;

- Adequate drainage;
- A satisfactory relationship with the character of the area.

The proposal represents an overdevelopment of a prominent corner plot resulting in a cramped and contrived form of development that is contrary to both local and national planning policy.