

Planning Application 261597 – Objection to Proposed Tenure Layout Variation

Submitted by: Charlotte Cullington

Comments:

Planning Application 261597 – Land at Old Forest Road, Wokingham RG41 1JA

I wish to make representations objecting to the proposed variation of Condition 2 of planning permission 251421.

I understand from the information provided that the application seeks to allow either Tenure Layout 092404-ELS-04 Rev E, which was approved under application 251421, or the revised Tenure Layout Rev F.

Having now reviewed the two tenure layouts, I understand the proposed change to be as follows:

Approved Rev E:

- 32 private units
- 11 Affordable Rent units
- 10 Affordable Shared Ownership units

Proposed Rev F:

- 32 Additional Shared Ownership units
- 11 Affordable Rent units
- 10 Affordable Shared Ownership units

Therefore, although the total number of dwellings remains at 53, the proposal would change the tenure of **all 32 previously approved private-market dwellings to additional Shared Ownership dwellings**. This would result in all 53 dwellings being designated as affordable housing.

I am not objecting to affordable or shared-ownership housing in principle. However, I consider this to be a substantial change to the approved scheme which warrants proper scrutiny rather than being treated simply as an administrative update to the approved plans.

The planning permission for 251421 was granted on the basis of a particular tenure mix, comprising 32 private dwellings and 21 affordable dwellings.

I therefore ask the Council to establish why the applicant now wishes to convert the entire private element of the scheme to additional Shared Ownership.

In particular, I would ask the Council to establish:

- What circumstances have changed since planning permission 251421 was granted?
- Why is the approved tenure arrangement no longer considered appropriate?

- Is the change being requested because of viability considerations?
- Has a viability assessment or other financial evidence been submitted to justify the change?
- Has a registered provider or other affordable-housing partner requested or agreed to this revised arrangement?
- Is the additional provision of 32 Shared Ownership homes genuinely an additional planning benefit, or is it necessary to make the development financially viable?
- Why is it necessary to permit either Rev E or Rev F rather than approving one clearly defined tenure arrangement?

I understand that a separate application, **261298**, concerns amendments to Schedule 1 of the Section 106 agreement relating to affordable housing.

Given the apparent relationship between that application and the revised tenure layout now proposed under 261597, I ask the Council to ensure that the two matters are considered consistently and transparently.

The public should be able to understand precisely:

1. what affordable-housing provision was originally secured;
2. what is now being proposed;
3. why the change is necessary;
4. what evidence supports it; and
5. whether the proposed change has any implications for the planning balance on which permission 251421 was granted.

Although the number of dwellings remains unchanged, changing 32 private dwellings to Shared Ownership represents a fundamental change in the tenure and nature of the approved development.

I therefore ask the Council to consider whether the revised tenure arrangement has implications for:

- parking provision and allocation;
- vehicle ownership assumptions;
- visitor parking;
- household composition and occupancy;
- estate management;
- communal facilities;
- refuse and servicing arrangements;
- open-space management;
- affordable-housing management; and

- any infrastructure or mitigation secured through the original Section 106 agreement.

If the change has implications for any of these matters, I would ask that the relevant assessments and mitigation are reviewed before the variation is approved.

I also ask the Council to consider this application in the context of the significant concerns that were raised when application 251421 was determined, particularly regarding the access via Old Forest Road, highway safety, the surrounding road network, protected trees and the alternative access from the Northern Distributor Road/Toutley Road.

I appreciate that application 261597 is specifically concerned with the tenure layout and that these matters were considered as part of the original application. However, where a significant alteration is now being made to the approved scheme, the Council should satisfy itself that the revised proposal does not have consequences for assumptions or mitigation associated with the original permission.

For the reasons above, I respectfully ask the Council to scrutinise application 261597 carefully and require the applicant to provide clear justification and supporting evidence for the proposed conversion of the 32 private dwellings to additional Shared Ownership units.

In particular, I would ask the Council to make clear the reason for the proposed change, the evidence supporting it, and its relationship with the proposed Section 106 amendments under application 261298.

Until this information has been adequately established, I do not consider that the proposed variation should be treated as a simple administrative amendment to the approved plans.

I therefore strongly object to the proposed variation in its current form and respectfully ask the Council to refuse the variation unless and until the above matters have been satisfactorily addressed.