

Statement from WBC Green Infrastructure

It is WBC Green Infrastructure's position that Reason for Refusal 3 should stand as it remains a valid justification for refusal on the following grounds:

1. The appeal site cannot be made compliant with (Local Plan) Managing Development Delivery (MDD) TB08 Open Space, Sport and Recreation Facility Standards with respect to the delivery of the full required quantum and/or size of public open space either on- or off-site; and
2. The appeal site is unsustainable in transport terms as it is not well-connected to public open spaces by non-motorised modes of transportation.

Compliance with MDD TB08 Open Space, Sport and Recreation Facility Standards

The application in question is a full planning application for the proposed erection of 16 no. dwellings with new access off Edney's Hill, plus footpaths, car ports, parking, landscaping and associated works.

As this is an application for residential development, it must comply with MDD TB08 Open space, sport and recreation facility standards for residential development. TB08 establishes the quantum of open space that is required to be provided with respect to new residential development. The purpose of this is to provide additional or improved green spaces, which can support the expected increase in residents resulting from new development and ensure residents of new developments have access to quality greenspaces within a reasonable distance of home.

Per TB08, this residential development is responsible for providing the following amount of public open space, based on 16 dwelling units.

Table 1: Public open space typologies expected for 16 new dwellings.

POS Typology	standard (ha per 1,000 population)	Application Requirement (in ha)
Parks and public gardens	1.1	0.0422
Amenity greenspace	0.98	0.0376
Play areas	0.25	0.0096
Civic space	0.01	0.0004
Outdoor sports facilities	1.66	0.0637
Cemeteries (in plots)	14.4	0.5530
Allotments	0.52	0.0200
Natural/semi natural green space	2.84	0.1091

Part 3.37 of MDD TB08 establishes that quantum of required open space is delivered as per the Open Space, Sports and Recreation Strategy (November 2013) document, which provides guidance on minimum sizes for each typology, as well as when on- or off-site provision is required.

No on-site provision of public open space has been included as part of the initial application. While information that has been provided by the applicant indicates “an area of open space for landscape and bio-diversity enhancements” on the southern boundary of the appeal site, no quantum of public open space has been given. Without more information, it is unclear if this area of open space would meet WBC policy. Further, no information has been provided thus far as part of the appeal to indicate that an on-site provision will be included.

Due to the limited size of the development site in question, consistent with the Open Space, Sports and Recreation Strategy (November 2013) document, no on-site provision of public open space is expected. As such, the typologies laid out in TB08 should be provided through a monetary contribution to create new or improve existing provision off-site, and within reasonable distance of the development site. While this is feasible for some of the typologies, due to the location of the proposed development site, we maintain that this is not possible for all required typologies.

Contributions to off-site provision

The Open Space, Sports and Recreation Strategy (November 2013) document states the following regarding off-site provision:

“In the event that a new residential development is of insufficient scale to be required to meet the MDD DPD public open space and Sports facilities standards within Policy TB08 through the provision of onsite facilities. The development will be required to meet the MDD DPD Policy TB08: Open space, sport and recreational facilities standards for residential development through a financial contribution towards improvements to the quality or accessibility of existing facilities and/or new off-site provision providing that any of the criteria below are met for any typology:

- (a) The residential development site lies outside the catchment of any existing facility.
- (b) The residential development site lies within the catchment of an existing facility/ies and at least one of those facilities has been identified as of poor quality within the Open Space, Sport & Recreation Facilities Assessment and Standards (2010 - 12).

(c) There is a borough wide unmet demand for the facility identified within the Open Space, Sport & Recreation Facilities Assessment and Standards (2010 - 12).”

For the following typologies, WBC Green Infrastructure have no objection to off-site provision due to the lack of space to provide it on the development site. Due to the proposed development meeting the criteria for point (a) above, should the development be allowed at appeal, we would seek the following contributions, including commuted sums to be used for maintenance of said off-site provision for a period of 20 years (where appropriate).

Table 2: Off-site provision contributions sought for the application site.

OFF-SITE PROVISION (contribution) as per policy TB08 - based on 16 new dwellings										
POS Typology	Standard	Application Requirement	Land Value		Total	Maintenance Cost				
	(ha per 1,000 population)		(@250,000/ha)	Construction cost						
Civic space	0.01	0.0004 ha	£	96.00	£	153.60	£	249.60	£	203.52
Outdoor sports facilities*	1.66	0.0637 ha	£	-	£	57,456.00	£	57,456.00	£	-
Allotments	0.52	0.0200 ha	£	4,992.00	£	5,990.40	£	10,982.40	£	-
Cemeteries	14.4	0.553 plots	£	-	£	1,789.76	£	1,789.76	£	-
Total						£	70,477.76	£	203.52	

*based on £3591 per dwelling contribution towards sports facilities at Gray's Farm

Regulation 122 of the Community Infrastructure Levy Regulations 2010 requires that a planning obligation may only constitute a reason for granting the planning permission for the development if the obligation is:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.

The above typologies are all deemed necessary as per MDD TB08 Open Space, Sport and Recreation Facility Standards, satisfying point (a) above. While ideally, these typologies would be easily accessible on foot, there is also an understanding that these facilities are meant to be accessible to a wider area of the borough and may require vehicle travel or public transport to reach them. Contributions for off-site provision would be used to either

create new or improve existing facilities as close as possible to the development site, in order that residents of the development may make use of them, satisfying point (b) above.

The contributions sought (table 2) are in line with the costs of providing new/improving existing facilities and are calculated based on the number of new dwellings. As such, they are fairly and reasonably related in scale and kind to the development and satisfy point (c) above. Further information on how these figures have been calculated, and the intended facilities at which the contributions would be spent, can be found in Appendix 1.

TB08 Typologies Unable to be Met

Green Infrastructure holds the position that the development cannot be made compliant using off-site contributions toward improvements to the quality or accessibility of existing facilities and/or new off-site provision **for parks and public gardens, amenity greenspace and play areas**. This is also the case for natural/ semi-natural greenspace, however, should the appellant secure SANG provision at a distance deemed reasonable to satisfy RfR 8, this SANG provision would satisfy the TB08 requirements for natural/semi-natural greenspace.

These typologies differ from the others, in that they should be provided within walking distance of the development. This is based on Fields in Trust (FiT) guidelines (Fields in Trust Standards: Creating great spaces for all (2024)), which are generally considered to be the best and most appropriate guidance on standards for green infrastructure available. FiT standards indicate that all homes should be within 200m to 300m walking distance of open space (either parks and public gardens, amenity greenspace and/or semi-natural greenspace), and that a full range of open space types should be within 1,000m. For non-SDL sites, the WBC Open Space, Sports and Recreation Strategy (November 2013) advises that parks and public gardens and play spaces should be delivered through off site contribution towards the enhancement of existing facilities within the vicinity of the sites. This guidance also states that amenity greenspace should be delivered on-site as part of site layout. However, due to the limited scale of the proposal site, providing amenity greenspace off-site (within 1000m of the development site) via contribution would also be an acceptable approach in this instance.

Parks and Public Gardens

There are no suitable facilities within 1000m of the application site, and as such, the requirements for this typology cannot be met as per TB08.

Amenity Greenspace

There is no amenity greenspace proposed on site. The only amenity greenspace within 1000m walking distance from the proposed development site is Barkham recreation ground, which already serves a large residential area, and has no scope for increasing the size or making meaningful improvements. As such, the requirements for this typology cannot be met as per TB08.

Play areas

The play area standards used by WBC are based on FiT guidelines. These state that every home should have access to the following:

- A Local Area for Play (LAP) for very young children within 100 metres (minimum size of 100 square metres).
- A Locally Equipped Area for Play (LEAP) for young and independent children, which should be reached safely and be within 400 metres walking distance (minimum size of 400 square metres).
- A Neighbourhood Equipped Areas for Play (NEAP) for older more independent children, which should be reached safely and be within 1000 metres walking distance (minimum size of 1000 square metres).
- Informal play spaces, which can include playful features integrated and distributed within a development along active travel routes, within playable streets or open spaces.
- Larger games areas for older children (e.g. multi use games areas, skateboard areas etc.), which should be within 700m walking distance (minimum size of 1000 square metres).

FiT guidelines further state that a development of up to 20 homes should provide informal play spaces on the development site. This has not been proposed by the appellant. While it is not expected that the application in question should provide the other facilities listed above, it is expected that these facilities should either already exist within the maximum walking distance for each, or that suitable land exists on which to create new spaces of these types within the maximum walking distance. The location of the proposal does not meet these criteria.

Barkham Recreation Ground

In the Appeal Statement of Case, the appellant states that Barkham Recreation Ground is circa 1,000m walking distance from the appeal site and that this is an entirely reasonable distance for future residents to walk. It is Green Infrastructure's position that this is not supported by policy and guidance, as illustrated above.

Barkham recreation ground consists of some amenity greenspace and a play area and is approximately 850m to walk from the application site. This is the closest public open space to the application site, and the only one falling within 1000m walking distance. As such, the application site does not satisfy the FiT criteria for having open space provision within 200-300 metres, and the full suite of open spaces within 1000m. Further, while there is existing amenity green space at the recreation ground, there is no scope to increase its size to account for the increased expected use from 16 new dwellings as laid out in TB08.

Walking route from proposal site to Barkham Recreation Ground.



Barkham Recreation Ground has both a LAP and LEAP play area (Juniper Playground – photos included in appendix 2). However, the 850m walking distance is beyond the 100m and 400m walking distance expected for a LAP and LEAP play area respectively. While it falls within the recommended walking distance for a NEAP play area, the play facilities at Barkham Recreation Ground do not meet the size or equipment type requirements for a NEAP. To create a NEAP play area in this location, significant financial investment beyond what would be sought from this proposed development would be required, as well as loss of amenity greenspace within the recreation ground. As such, this is not feasible, and it should be taken that there is no reasonable prospect of a NEAP being created within the 1000m walking distance of the proposal site, with the nearest existing NEAPs being Finchampstead Baptist Church (3200 metres walking distance), and California Country Park (3600 metres walking distance). As such, the development site does not fulfil the

standards for play space of any play typology (LAP, LEAP or NEAP) as laid out by FiT guidelines and the WBC Play Space Design Guide.

Green Infrastructure would further question the accessibility of Barkham Recreation Ground and Juniper's Playground from the appeal site from a safety perspective. Residents would be expected to walk cross Barkham Road where there is currently no dedicated crossing and travel up Aggisters Lane for 250 metres. While Aggisters Lane is a Public Right of Way, it is a narrow surface shared with vehicles, and without a pedestrian footpath. It is also unsurfaced and unlit. While safety concerns were not initially raised in our comments, it is something that should be considered from an accessibility perspective if looking at Barkham Recreation Ground and Juniper's Playground. FiT guidelines also emphasise the safety of walking routes to green spaces and play spaces.

Street View image of Aggisters Lane.



Conclusion

WBC Green infrastructure upholds the objection (via RfR 3) to the proposed development on the grounds that it is insufficiently connected to existing green infrastructure, with no opportunity to provide additional public open spaces as required by policy MDD TB08, within reasonable walking distance of the site. Further, there are safety concerns regarding access to the nearest open space, Barkham Recreation Ground.

Appendix 1

Contribution Calculations and Intended Use

1. Civic Space

Civic space is characterised as being an area in which people can meet, assemble and communicate freely. In the context of housing development, these tend to be spaces such as public squares or other outdoor meeting areas.

The contribution sought of £453.12 is scaled to the development size, and is made up of a land value of £250,000 per hectare (£96 scaled for this development), a construction cost of £40 per m² (£153.60 scaled for this development), and a maintenance cost of £2.65 per m² (£203.52 scaled for this development) to cover a maintenance period of 20 years.

These funds would be ringfenced for improvements and maintenance on existing civic space within reasonable distance of the application site. This will be either civic spaces within Wokingham town centre or the new development at Arborfield Green.

2. Outdoor Sports Facilities

The Outdoor Sports contributions will be used toward the delivery of new outdoor borough-wide sports facilities at Gray's Farm. The contribution agreed is based on that first established for the Keephatch Beech S106, signed on 25 March 2015 (£2,347). It has been agreed that to index (BCIS) from 25 March 2015 to date, using today's rate which is £3,591.00 per dwelling. For this development of 16 dwellings, the amount sought is £57,456 (16 dwellings x £3,591.00).

The contribution is derived from work undertaken in respect of outdoor sports provision at Cantley, details of the calculation are provided below.

Item	Estimated costs
Cost of works identified in Cantley Masterplan (Option 3a)	£2,426,125 – £2,669,100
Estimated cost of purchasing Bell Farm (6.275ha) *	£852,458.75
Total costs	£3,278,583.75 - £3,521,558.75
Per dwelling cost assuming around 1500 in SDL	£2,185.72 - £2,347.41

* Assuming an average Land value of £135,850 per hectare as indicated by an independent valuer secured by David Wilson Homes (Haslams) for the Buckhurst Farm application)

The Council did not secure Bell Farm for sports use and pivoted in 2014/15 to an alternative site at Grays Fruit Farm which could deliver sports facilities for both North and South Wokingham SDLs. The contribution calculation has been retained as it represented a reasonable scalable cost for the sports hub facility.

3. Allotments

Due to the constrained nature and layout of the application site and scale of the proposal, providing policy-compliant Allotments on-site is not practical or desirable. It is more sustainable and efficient to enhance a larger, properly managed existing site. The quantum of Allotments is calculated based on the population generated by the 16 new dwellings, using the per-capita standards set out in MDD LP Policy TB08. The cost associated with enhancing existing facilities is based on a land value cost (£250,000 per hectare) of £4,992.00 and a construction cost of £5990.40 (£30 per m²), totalling £10,982.40.

The financial contributions will be used for enhancing, managing, and maintaining existing Allotments facilities in sites that serve the development, which are located in Arborfield Green, Wokingham Town, and Finchampstead.

4. Cemeteries

The cemeteries contribution is based on the Indicative costings for Provision of a New Cemetery in Wokingham Borough document, which lays out the budget for provision of new cemetery plots in the borough. The cost per dwelling for new cemetery plots has been calculated to be £111.86.

The application development proposes 16 new dwellings and consequently will require a contribution of £1789.76 (Number of proposed dwellings x £111.86) towards the provision of additional cemetery space.

Appendix 2

Photographs of play facilities at Barkham Recreation Ground

