

# Local Green Space Assessment Methodology

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## Spelthorne Takes Shape

October 2019

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## 1. INTRODUCTION

- 1.1 Spelthorne Borough Council is preparing a new Local Plan which will set out policies and proposals that will guide development in the Borough throughout the period of the new plan covering 2020-2035.
- 1.2 The Council undertook its Issues and Options consultation in May/June 2018. This set out the main issues for Spelthorne and identified four potential strategic options that could address the main challenges faced. The responses received to the consultation will assist in preparing the Preferred Options and overall strategy for the new Plan.
- 1.3 The new Local Plan must consider a number of strategic issues and as part of this a robust and up-to-date evidence base must be produced to inform the Plan. One of the strategic issues the Plan must consider is the protection of land as open space for recreation, character and significance to local communities.
- 1.4 One of the mechanisms by which spaces can be protected is by applying a Local Green Space designation. The Local Green Space designation was introduced by the National Planning Policy Framework (NPPF) in March 2012 which offers a high degree of protection to areas of importance to the local community. This is on the basis that the land meets certain criteria to achieve the designation. The designation was carried forward in the revisions of the NPPF published in July 2018 and February 2019. A further revision to the NPPF has been published in July 2021. The designation remains in place following this latest revision with the relevant paragraph numbers in the NPPF updated to reflect wider changes within the Framework, but which do not impact upon LGS. References to these within this document have also been updated to reflect the changes to the paragraph numbers.
- 1.5 This section outlines the process that the Council will undertake as part of searching for and identifying sites that are considered to be appropriate to be classified as Local Green Space within the Borough.
- 1.6 The methodology expands on the principles of Local Green Space as identified within the revised NPPF. The NPPF provides initial guiding principles around which the Local Green Space designation should be formed however it leaves the decision-making process to the Local Authority, in partnership with local communities, to designate Local Green Space within the Borough. The process for selection and designation is laid out within this methodology to show the process which the Council will follow when considering sites for designation. This process will be in line with national policy and guidance insofar as this is applicable.
- 1.7 The NPPF (2021) in paragraph 101 states that 'the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated

when a plan is prepared or updated and be capable of enduring beyond the end of the plan period’.

### Potential areas for Local Green Space designation

- 1.8 Within the current Core Strategy, a total of 71 sites have the designation of protected urban open space (PUOS). These sites are listed in Appendix 1 of this document and incorporate council-owned parks and recreation grounds, private sports grounds, school grounds, open land within residential estates and other land as identified. The PUOS designation was first developed as part of the 2001 Local Plan under Policy BE14 – Open Space and carried forward into the Core Strategy (2009) under Policy EN4 – provision of Open Space and Sport and Recreation Facilities. The intention of the PUOS was to seek to maintain the quality of open spaces within the Borough.
- 1.9 In the Issues and Options consultation, one of the questions asked was ‘*Do you agree that the Public Urban Open Space designation can be removed and we should consider sites for designation as Local Green Space instead*’. There were a total of 166 responses to this question, 93 responses (56%) were in support of removing the designation, 44 responses (27%) were against whilst 29 responses (17%) said they did not know. There was therefore support from the responses for using the LGS as an alternative to PUOS. Therefore, the PUOS sites will be assessed against the criteria to determine if they should be designated as LGS.
- 1.10 In addition to this, Q5 of the consultation document requested responders to suggest sites that should be considered for the LGS designation. A total of 94 responses to this question were received and the sites put forward through this process will also be assessed against the criteria to determine if they should be considered suitable for the LGS designation.
- 1.11 The NPPF within paragraph 101 states that ‘*designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them*’. Therefore national policy supports local communities where they have submitted a site for consideration.
- 1.12 The criteria for undertaking the assessment of the sites are specified below and are based around the principles as stated within the NPPF paragraphs 101 and 102 as well as additional guidance contained within the PPG.

## 2. LOCAL GREEN SPACE CRITERIA

- 2.1 There has been no standard methodology produced by the Government against which the areas proposed to be designated as Local Green Space are assessed. Therefore, the Council have produced its own methodology to accord with the NPPF and guidance as set out within PPG. In addition, Spelthorne have also utilised assessments carried out by other authorities, particularly neighbouring Runnymede and Elmbridge, to inform the assessment and decision-making processes.
- 2.2 The NPPF and PPG sets out the main principles for Local Green Space designations which include three key criteria that need to be met in order for the site to be considered as Local Green Space. The three criteria are:
- Reasonably close proximity to the community it serves;
  - Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
  - Local in character and is not an extensive tract of land

### Reasonably close proximity to the community it serves

- 2.3 The NPPF and PPG do not define what ‘reasonably close proximity’ means. The NPPF states that to be considered for designation, the green space should be in reasonably close proximity to the community the space serves. The PPG states that the proximity of designated Local Green Space to the community will depend on local circumstances. It specifies that if public access is a key factor, then the site would normally be within easy walking distance of the community it serves.
- 2.4 The Government does not intend for green spaces which are isolated or not easily accessible to be designated. The Council will focus on the accessibility of the land, which will include how accessible the land is in terms of public footpaths and whether there are barriers e.g. roads, railways lines, rivers etc.
- 2.5 Natural England’s Accessible Natural Greenspace Guidance sets out an appropriate walking distance when assessing the proximity of a community to a service or facility. The standard distance given is **300m** and this will be appropriated as part of the assessment. This distance will be used as a guide rather than the sole determining factor. The main intention of this criterion is to focus on the accessibility of the land. A judgement will therefore have to be made, particularly in relation to land which is private and where there is no public access. As such land will generally not be included unless there is clear evidence of its importance

### Demonstrably special to a local community

- 2.6 The NPPF states in order to be considered for designation, the site or area should be demonstrably special to a local community and have a particular local significance. Five factors for consideration as part of this assessment are listed below:
- Beauty
  - Historic significance

- Recreational value (including as a playing field)
- Tranquillity
- Richness of its wildlife

2.7 The NPPF and PPG do not provide any further detail on what is meant by each of the bullet points stated above. It is therefore for the Council to determine where a site or area is considered to be 'demonstrably special to a local community'. Factors which will be taken into account as part of an assessment relating to each of the five bullet points are listed below. It is not necessary that a local green space meets all of these factors for the space to be considered however it should meet at least one as a minimum:

- **Beauty** – includes the visual attractiveness of the area(s) and their contribution to townscape, landscape and character. Any flora and fauna which are considered to be special to the local area will also be important. Areas designated as Local Green Space will contribute to local character and help to form the identity of the place.
- **Historic significance** – factors include whether the area has archaeological value, is within, or impacts upon, a conservation area or if the area provides a setting for a statutorily listed building or similar historic feature.
- **Recreational value** – this would include an area which supports activities or events which are considered to provide value to the community and are considered to be of local significance. As part of this, the importance of the space will be assessed through its use by residents and the proximity to other spaces offering similar facilities.
- **Tranquillity** – this includes providing value through offering an area which is away from urban areas or provides a space for reflection. These areas will allow its users to be away from pollution and noise of the urban area and provide an environment where the users can escape to.
- **Richness of wildlife** – the area(s) may have ecological importance, be subject to local, national or international designations due to its wildlife or support wildlife which can be evidence such as through providing hedgerows, ponds, mature trees.

2.8 The Council requires evidence when sites are submitted as to why that site and/or area is of significance to the local community and why it should be considered suitable for the protection afforded by its designation when compared to other areas of open space in the Borough. This evidence could include, for example, photographic evidence or details of how the community has used the space over a period of time e.g. community events.

### Local in character and not an extensive tract of land

2.9 The NPPF states that the Local Green Space designation should only be applied where the green space is not an extensive tract of land. PPG states that there are no rules governing how large a Local Green Space can be and a

degree of judgement will be needed. However, along with the NPPF principles, blanket designations of open countryside adjacent to settlements will not be considered appropriate. This seeks to ensure that the designation is not used as a means to achieve a new area of Green Belt by another name.

- 2.10 The Council will gather evidence and make a judgement on a site-by-site basis when it comes to determining whether a space meets these criteria as part of a submission for designation. Local Green Spaces should have 'clear and defensible boundaries' therefore generally discounting larger sites.

### **Sites with Planning Permission**

- 2.11 As set out within PPG, sites which have planning permission for development will not be considered suitable for the designation and will therefore be discounted.

### **Green Belt**

- 2.12 PPG states that if land is already designated as Green Belt, then consideration should be given as to whether any additional local benefit would be gained from designating the land as Local Green Space.
- 2.12 PPG states that one potential benefit applies to areas where protection from development is the norm e.g. villages included within the Green Belt but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community.
- 2.13 This guidance would, however, unlikely to apply to Spelthorne as the Borough does not have any villages which are washed over by Green Belt. Sites that are within Green Belt would already benefit from the protection of the Green Belt designation and the requirement to demonstrate very special circumstances to allow for either the site to be removed from the Green Belt or to allow development within the Green Belt.

### 3. ASSESSMENT PROCESS

- 3.1 The assessment will take place over two stages.

#### **Stage 1: Desktop review and first sieve**

- 3.2 The first stage of this evaluation involves a desktop assessment of the 25 sites described in the communities' Local Green Space Report against 4 initial criteria in order to identify and discard sites which are clearly not able to meet the NPPF criteria. The criteria are:

- The green space is in reasonably close proximity to the community it serves;
- The green space is local in character and not an extensive tract of land;
- The green space is not allocated for another use; and
- The green space does not already have planning permission for development.

- 3.3 As a guideline, the Council will not seek to designate any land which is larger than 10ha (approximately 24 acres) as this will be determined to be 'an extensive tract of land'. This threshold was selected as Local Green Spaces should have 'clear and definable boundaries' and those that were above this threshold tended not to meet this criterion. The 10ha limit is also considered to be an appropriate threshold as spaces which are not designated as Green Belt fall below this size. Any sites larger than this will be automatically excluded during the initial 'sieving' exercise at the start of the area analysis process.
- 3.4 If the green space passes the four criteria, then it will move to the next stage of the process.

#### **Stage 2: Detailed analysis**

- 3.5 The second stage of assessment involves a more detailed analysis of the sites remaining following the first sieve. Stage two assess the site against the criteria comprising demonstrably special to a local community as outlined below:

#### **Demonstrably special to a local community**

- 3.6 The assessment of whether a proposed site is considered to be demonstrably special to the local community involves consideration of the five key criteria as set out below. In order to be considered for the designation, the Council will expect that at least one of the five criteria is met as a minimum.
- 3.7 Assessment of the five criteria is challenging because terms such as 'beauty' are subjective. The below however sets out the primary attributes that the Council will consider for each of the five criteria as part of the assessment process.



## **Beauty**

- 3.8 The Council will assess the visual attractiveness of the areas and their contribution to the local character, landscape, flora and fauna. Local Green Spaces will be contributors to local identity and character of the area and a sense of place.

## **Historic Significance**

- 3.9 Consideration will be given to the proposed areas and whether they, or areas of them, have a historical significance. The areas may reflect an archaeological site or other historical feature, provide the setting to a statutory listed building or scheduled monument or be within a Conservation Area.

## **Recreational Value**

- 3.10 A Local Green Space would normally be more than just an informal play area or grassed pitches. For an area to be designated, the local significance of its recreational value, in terms of the variety of activities it supports and therefore its value to the community would need to be demonstrated. As part of this, the frequency of use by residents and the proximity to other similar spaces will be assessed to ensure that those spaces which are used by the community and are more isolated from other recreation land are considered for the importance of their role.

Formal recreational facilities such as bowling greens, grass tennis courts, golf courses, playing fields, grass play areas and allotments would not on their own be necessarily enough to meet the criteria fully, although they may be included where they are either part of a wider greenspace or have a particular local significance. Similarly, the existence of a right of way across land for example would not in itself be demonstration of significant recreational value.

## **Richness of Wildlife**

- 3.11 A Local Green Space may be of particular local significance because of its importance for wildlife. This can take the form of international, national or local wildlife designations in addition to non-designated features that have the ability to support wildlife, e.g. mature trees, ponds, hedgerows, riverbanks etc.

## **Tranquillity**

- 3.12 A degree of remoteness is expected in areas that are tranquil although this is unlikely to be the case in Spelthorne. The Borough's proximity to Heathrow Airport alongside the M25 and M3 motorways play a role in significantly reducing tranquillity in most parts. However, tranquillity can also be sought within areas which allow for contemplation and reflection. Positive tranquillity factors include landscape, woodland, rivers, lakes and hearing natural sounds such as birdsong, an absence of human activity or even silence. Evidence for this is primarily gathered through observations made when on site.

- 3.13 In addition to the above, two additional criteria are included in the stage two assessment process as set out below:
- **Public access** – Although not a requirement for LGS designation, public access can be a key factor as to why the site may be considered demonstrably special, for example with regard to its recreational value. This criterion has been added to assist in identifying where public access is necessary in order to fulfil the criteria.
  - **Layers of designation** – The PPG asks that, where there are already protective designations on site, consideration is given to what additional benefit LGS designation would offer. This criterion is added so that it is clear where there is potential for layering of designation, so consideration can be given as to the benefits of LGS designation.
- 3.14 Site visits are undertaken to support the detailed analysis of the stage 2 assessment. An on-site appraisal is then made for each proposed Local Green Space to determine if they meet the criteria as set out above.
- 3.15 Grass verges adjacent to roads are generally not considered appropriate for the LGS designation. This is because such land is unlikely to fulfil the criteria as set out in the NPPF, for example such sites are not tranquil nor provide any recreational value.

## APPENDIX 1: List of current Protected Urban Open Space sites

The following spaces are shown on the Council's Proposals Map:

### **Council-owned Parks and Recreation Grounds**

- A1. Alexandra Road, Ashford
- A2. Ashford Recreation Ground, Clockhouse Lane, Ashford
- A3. Cedars Recreation Ground, Green Street, Sunbury
- A4. Feltham Hill Road, Ashford
- A5. Groveley Road, Sunbury
- A6. Lauser Road (eastern end), Stanwell
- A7. Scott Freeman Gardens, Church Road, Ashford
- A8. Staines Park, Knowle Green, Staines
- A9. Stanwell Recreation Ground, Oaks Road
- A10. Village Park, Hadfield Road, Stanwell
- A11. Memorial Gardens, Staines
- A12. Spelthorne Grove, Sunbury
- A13. Holywell Way, Stanwell
- A14. Shepperton Studios
- A15. Glebeland Gardens, Shepperton
- A16. Former line of Lower Sunbury Relief Road (TP26)

### **Private Sports Grounds**

- B1. Ashford Sports Club, Woodthorpe Road, Ashford
- B2. Lazards Sports Club, The Avenue, Sunbury
- B3. Gaflac Sports Ground + London Irish RFC, The Avenue, Sunbury
- B4. Elmsway Tennis Club, Elmsway, Ashford School Grounds
- C1. Town Farm School Stanwell
- C2. Echelforde School, Park Road, Ashford
- C3. R/O Spelthorne College, Church Road, Ashford
- C4. Staines Prep School, Gresham Road, Staines
- C5. R/O Our Lady RC School and Kingscroft Junior School, Park Ave, Staines
- C6. Matthew Arnold School, Staines
- C7. Sunbury Manor School, Nursery Road, Sunbury
- C8. St Nicholas School, Shepperton
- C9. St Paul's School and St Teresa's Convent Sunbury
- C10. Thamesmead School, Shepperton
- C11. Halliford School, Shepperton
- C12. Springfield CF and Middle School, Sunbury

### **Open Land within Residential Estates**

- D1. Hadrian Way/Canopus Way, Stanwell
- D2. The Royal Estate (Edinburgh Drive/Elizabeth Avenue), Staines
- D3. Beechwood Avenue/Ashridge Way, Sunbury
- D4. Belgrave Road/Batavia Road, Sunbury
- D5. Preston Road/Greeno Crescent, Shepperton
- D6. Selwood Gardens, Stanwell
- D7. Strodes Crescent, Staines
- D8. Denman Drive, Ashford
- D9. Chessholme Road, Ashford
- D10. Norman Road, Ashford
- D11. Tudor Road, Ashford
- D12. Nell Gwynne Avenue/Caesers Way, Shepperton

- D13. Catlin Crescent, Shepperton
- D14. Lime Crescent, Sunbury
- D15. Catherine Drive, Sunbury
- D16. Heathcroft Avenue, Sunbury
- D17. Feltham Hill Road/Woodlands Parade, Ashford
- D18. Elgin Avenue, Ashford

**Other Land**

- E1. Horton Road/Hithermoor Road, Stanwell Moor
- E2. Jordans Close/Town Lane, Stanwell
- E3. Duncroft, Wraysbury Road, Staines
- E4. Adjacent River Colne, Church Street, Staines
- E5. Knowle Green
- E6. Allotments, Staines Park
- E7. R/O Riverside Flats, Laleham Road
- E8. Penton Hall Drive, Laleham
- E9. Penton Hook Road
- E10. R/O Brookside Avenue, Ashford
- E11. Grounds of Sunbury Court, Sunbury
- E12. Flower Pot Green, Thames Street, Sunbury
- E13. Cemetery, Church Road, Shepperton
- E14. Allotments, Grove Road, Shepperton
- E15. Gordon Road/Russell Road, Shepperton
- E16. Staines Res. Aqueduct (Shortwood Common to Ashford Road)
- E17. Staines Res. Aqueduct (Ashford Road to Spelthorne Lane)
- E18. Staines Res. Aqueduct (West of Windmill Road)
- E19. Staines Res. Aqueduct (Windmill Road to M3)
- E20. St Matthews Church, Ashford
- E21. Land at Sunbury Cross between M3 and railway