

Open Spaces Study Stage 1

ON BEHALF OF CROYDON COUNCIL

December 2023

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1. Introduction

Overview

1.1 This Open Spaces Study has been commissioned by Croydon Council ('the Council'). The preparation of the Study has been led and co-ordinated by Nexus Planning ('Nexus').

- 1.2 The purpose of the Study is to inform current work underway in the preparation of a partial review of the emerging Croydon Local Plan. It aims to provide the Council with an up-to-date, objective assessment of Croydon's Open Spaces and recommends where currently available evidence clearly identifies a shortlist of which sites can go forward at this stage with a positive recommendation for Local Green Spaces designation.
- 1.3 The Study has been prepared to reflect the requirements for planning policy soundness for Local Green Space Designation (LGS) which are set out in the latest iterations of the National Planning Policy Framework (the 'NPPF') (published September 2023), and National Planning Guidance (Open space, sports and recreation facilities, public rights of way and local green space [published 6 March 2014]).
- 1.4 An innovative methodology has been developed to present a robust and objective approach to identification. Thus, a shortlist of sites is selected that demonstrably and irrefutably meet the stringent requirements of national policy for the purposes of the publication and examination of this partial review. Where a site under investigation is considered to not meet the stringent requirements for LGS at present, but where there is a meritable case for protection against inappropriate development, an alternative protection measure is recommended.
- 1.5 Whilst not all sites coming forward are recommended for LGS at this time, this does not preclude reconsideration at subsequent local plan reviews. The methodology can evolve in due course to consider further sites as additional evidence becomes available. This approach is appropriate at this time where there is some evidence that participation, activity rates and open space usage in some cases have not yet fully returned to pre-Covid levels.
- 1.6 The purpose of LGS is a way to provide special protection against development for green areas of particular importance to local communities. It is stressed that even without LGS, locally cherished and significant local spaces will be identified in the Local Plan and Policies Map and will continue to be protected from inappropriate development by suitably framed planning policies in the Local Plan Review.

Structure of the Study

- 1.7 This report is structured as follows:
 - Section 2 provides a summary of the key national and local open space policy contexts relevant to the Study. It also
 gives further information on the purposes of LGS designation including the background and the justification for the
 methodological approach taken.
 - Section 3 refers to individual appraisals of the 20 locations identified as 'Local Green Spaces', as well as descriptions of 82 further sites identified as 'Important Green Spaces' in the Council's assessment.
 - Section 4 set out our overall recommendations.

2. Policy

NPPF

2.1 A 'Local Green Space' is discussed under the NPPF (2023) as follows:

- 105. 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.
- 106. The Local Green Space designation should only be used where the green space is:
 - a) in reasonably close proximity to the community it serves;
 - b) 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
 - c) local in character and is not an extensive tract of land.
- Policies for managing development within a Local Green Space should be consistent with those for Green Belts.
- 2.2 Local Green Space (LGS) designation was introduced in the 2012 NPPF as a mitigation for the restrictions on town and village green applications in the Growth and Infrastructure Act 2013. As set out in paragraphs 105-107 and footnote 7 of the NPPF, the LGS provides the same level of protection as Green Belt to areas of green space that are particularly valued by their local communities.

Planning Practice Guidance: Open Space, Sports and Recreation Facilities

- 2.3 The PPG (published in 2014) confirms Local Green Space designation is a way to provide special protection against development for green areas of particular importance and demonstrably special to local communities. LGS may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city. If land is already protected by Green Belt policy or as Metropolitan Open Land (in London), then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.
- 2.4 The Guidance is subject to the overall objectives of sustainable development as set out in the NPPF and the specific criteria set out the National Planning Policy Framework (set out above) and expands on what types of green area can be identified as Local Green Space. PPG assists in clarifying circumstances for consideration at the time of Plan making as whether LGS designation may be considered as appropriate. The PPG states:

"Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis."

"The proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served."

"There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph [106] of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. [...]"

"Provided land can meet the criteria at paragraph [106] of the National Planning Policy Framework there is no lower size limit for a Local Green Space."

"Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).

Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected."

"Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation."

"A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan."

The London Plan

2.5 The London Plan does not specifically address Local Green Space designations. However, Policy G4 of the London Plan states that Development Plans should include appropriate designations and policies for the protection of open space to meet needs and address deficiencies.

Croydon Local Plan (Adopted, 2018)

- 2.6 The adopted Croydon Local Plan does not currently identify any Local Green Spaces.
- 2.7 During the examination by the Planning Inspector appointed by the Secretary of State to examine the Local Plan into the draft Croydon Local Plan and Policies Map (subsequently adopted in 2018), the Council's policy and designation of sites as LGS was subject to inspector's questions as to soundness. The Planning Inspector considered that the policy and designations did not fully meet the requirements of national policy. In particular, there was insufficient evidence to demonstrate the particular importance of each site as set out in Paragraph 106 of the NPPF.
 - 2.8 The Inspector recommended the following relevant 'Main Modification' to the Local Plan:

"To delete Local Green Space designations pending a further review" (ref. non-technical summary at Page 3 of the Planning Inspector's report).

2.9 Comments made by the Inspector made it clear that Local Green Spaces should demonstrably hold value beyond simply being green spaces, and that they should not be designated simply as a protective measure or to duplicate existing designations. It is necessary to demonstrate that every Local Green Spaces satisfies the 'proximity', 'significance' and 'local' criteria set out under NPPF Paragraph 106, particularly given that the LGS enjoy the same level of protection as Green Belt land.

2.10 An extract from the Planning Inspector's Report is provided at Appendix C, with comments relating to Local Green Space designation addressed at paragraphs 225-243.

Croydon Local Plan Review

- 2.11 Taking on board the previous experience where all sites put forward by the Council as LGS were rejected, the Council begun work on establishing a robust evidence base in 2019. In June 2019, the Council opened two public surveys; one to gain feedback on the sites it previously proposed, and a second to learn of any additional spaces which the community felt might be worthy of designation.
- Over 7,000 responses were received to the first survey, and over 700 responses were received to the second survey. The second survey resulted in an additional 210 sites coming forward from the community for consideration.
- 2.13 Having assessed candidate sites, the Council then took forward 42 sites to its Issues and Options Report (2019) and 2 additional sites based on the representations received at the Reg 18. Stage.
- 2.14 In 2020, there was a 2nd round of consultation to assemble any additional evidence from the communities on how demonstrably special these spaces are. At that time it was considered prudent, for the purposes of the first partial review of the Local Plan, to focus on a front runner shortlist. 20 Local Green Spaces were selected to provide a consistent and objective methodology which could be informed by the consultation responses.
- 2.15 The 20 spaces selected for further consideration as the first tranche are listed below:
 - Addiscombe Railway Park
 - Biggin Wood
 - Coulsdon Memorial Ground
 - Foxley Wood and Sherwood Oaks Field
 - Higher Drive Recreation Ground
 - Millers Pond
 - Park Hill Recreation Ground
 - Portland Road Community Garden
 - Purley Beeches
 - Rotary Field Recreation Ground
 - Sanderstead Pond (and Green)
 - Sanderstead Recreation Ground
 - Shirley Oaks Playing Field and Woods
 - Shirley Recreation Ground
 - Spring Park Wood
 - Stambourne Woodland Walk
 - Temple Avenue Copse
 - The Lawns

- Wettern Tree Garden
- Woodcote Village Green
- 2.16 It may be seen that the approach taken towards the selected 20 sites was to consider whether there was an overwhelming case to be made using a methodology solidly based on the NPPF and where objective demonstrable independent evidence could be readily assembled. It is noted that some of the examples cited in the PPG of land which is "valued" are less about total numbers of visits for example because access may be restricted and more about what may be described as qualitative aspects. To ensure the soundness of the methodology can be demonstrated, a precautionary approach to the evidence has been taken at this time, hence a greater emphasis toward quantitative aspects rather than less easily measured qualitative aspects. It may be anticipated that there are sites not presently recommended which may come forward for consideration or reconsideration for designation at a later time.
- 2.17 Of the sites investigated that did not overwhelmingly meet the evidential criteria for Local Green Spaces designation as a first tranche, they are proposed for 'Important Green Space' protection and may come forward for consideration as any further matters of substance comes forward consistent with the NPPF/PPG at this or a subsequent further review of the Local Plan when:
 - Further objective evidence is forthcoming;
 - The methodology is found sound, and consideration is given more broadly to both the NPPF and PPG directives over matters such as "local value"; or
 - Activity and participation rates have settled back to "normal" following recovery from successive COVID waves.
- 2.18 The sites proposed to be protected under 'Important Green Space' designation are selected either via community engagement or protected as open spaces under the adopted local plan. These sites are worthy of protection because of their contribution to open space needs. Policy G4 'Open Space' of the London Plan states that development plans should "include appropriate designations and policies for the protection of open space to meet needs and address deficiencies". Table 8.1 of the London Plan defines a number of categories of public open spaces. It is these categories and definitions that have been applied to spaces protected as 'Important Green Spaces'.

Defining Local Green Space

2.19 Local Green Space is not specifically defined in adopted planning policy documentation, including the NPPF, or in the PPG. In discussion with council officers it is seen as useful to have a definition of LGS to appear in the Glossary of the LP as follows:

A Local Green Space is an open area which is local in character and proximity, not excessively large, demonstrably special to the community it serves and holds a particular local significance; for one or more reasons such as beauty, history, ecology, recreational value or other quality of life value etc. A LGS is designated in a Local Plan (or Neighbourhood Development Plan) for long term protection capable of enduring beyond the end of the plan period and which is consistent with the principles of sustainable development. Within a LGS, inappropriate development should not be approved except in very special circumstances.

3. Assessment

Introduction

3.1 Nexus has been asked to consider 102 sites under the Council's current consideration of Green Spaces. This comprises 20 sites which the Council considers are strong contenders for front runner designation as Local Green Spaces, as well as a further 82 sites which the Council as classified as 'Important Green Spaces' as mentioned above.

- 3.2 For the 20 Local Green Space candidate sites, we are asked to consider each site against the three key criteria set out at Paragraph 106 of the NPPF, and to consider whether these sites have all of the characteristics necessary to robustly put them forward for designation. In order to arrive at clear views on these aspects, we have combined the qualitative views of the community from the 2019-2020 consultation events with an updated assessment based on desktop data, with a new element of quantitative assessment, namely mobile phone location data which allows us to accurately understand footfall and dwell-time data across the various candidate sites.
- 3.3 For the 82 Important Green Spaces, we were asked to undertake a more simplistic assessment of footfall and dwell-time data as an indicator as to whether any of these sites might warrant immediate consideration for promotion to the Local Green Spaces category or for further review at a later stage.

Methodology

- 3.4 The Council received community comments in 2020 on each of its 20 candidate "front runner" sites for Local Green Spaces. These have been shared with Nexus and we have extrapolated key comments on more subjective matters such as the value attributed to the space by the community itself. Added to this, we have reviewed the previous comments for the passing of time and added any further details obvious from our desktop appraisal of each site.
- 3.5 As detailed further in Figure 3-1, we have additionally utilised a wide range of empirical data which is both sourced directly for this study, as well as that which is available from internet sources.
- 3.6 In terms of new empirical information, we have utilised two key data providers as follows:
 - Experian AppLibrary Nexus subscribes to Experian's online census software tool which allows us to examine up-to-date census information for the area covering each candidate site.
 - YellowSubmarine.io We have worked with Yellow Submarine to obtain footfall and dwell-time data for all 102 sites under consideration by the Council. Yellow Submarine utilise a footfall data tool which draws from Android, Apple and Google smartphones (covering 97% of the market). They provide accurate live raw data feeds every 15 minutes which are fully anonymized and GDPR compliant. The footfall data supplied by Google excludes the period 12am-4am as Google downloads a large amount of data during that period meaning that readings would not be accurate.
- 3.7 We have therefore utilised a wide range of up-to-date data sources to report against the three key NPPF criteria, which is summarised in Figure 3-1.

Figure 3-1 Reporting Categories

| Category | Criteria | Source |
|--|--|--|
| Preliminary Information | Name and address of site Aerial Map Council Description Local Plan Designations | Google.com Google Maps Croydon Council website Croydon Local Plan 2018, Proposals Map |
| NPPF Test 1: Proximity to the Community it Serves | Population within 1km (2023) Footfall per Day (October 2022) Average Dwell-time (October 2022) Age Profile within 1km (2023) Residential Tenure within 1km (2023) PTAL Rating | Experian AppLibrary YellowSubmarine.io YellowSubmarine.io Experian AppLibrary Experian AppLibrary Transport for London website, WebCAT tool |
| NPPF Test 2: Demonstrably special to a local community and holds a particular significant, for example because of its beauty, historic significance, recreational value, tranquillity, or richness of wildlife | DEFRA Classification Historic Significance Community Importance Sports Facilities Tranquillity | DEFRA website + Magic Map website Historic England + Nexus research Community engagement + Nexus research Nexus research Community engagement |
| NPPF Test 3: Local in Character and not an extensive tract of land | 1) Local Character | 1) Nexus research + Community engagement |

- 3.8 Building on this research, we have categorised each site as having 'high', 'medium', or 'low' value against the three key NPPF criteria, as well as arriving at an 'Overall Value'. These assessments form the basis of our final recommendations in Section 4.
- 3.9 Our 20 site appraisals for the Local Green Space candidate sites are included at **Appendix A**.

3.10 A summary of our findings is set out at Figure 3-2 below.

Figure 3-2 Local Green Space Appraisals – Summary of Findings

| Site | 'Proximity to the Community' | 'Significance to the Community' | 'Local in Character' | Overall |
|--|---------------------------------|---------------------------------|-------------------------|---------|
| 1. Addiscombe Railway Park | High | High | High | High |
| 2. Biggin Wood | Medium | High | Medium | Medium |
| 3. Coulsdon Memorial Ground | Medium | High | High | High |
| 4. Foxley Wood and Sherwood Oaks Field | Medium | High | High | High |
| 5. Higher Drive Recreation Ground | Medium | Medium | Medium | Medium |
| 6. Millers Pond | Medium | High | High | High |
| 7. Park Hill Recreation Ground | Medium | High | High | High |
| 8. Portland Road Community Gardens | Low | Low | Medium | Low |
| 9. Purley Beeches | High | High | High | High |
| 10. Rotary Field Recreation Ground | Medium | High | High | High |
| 11. Sanderstead Pond (and Green) | Medium | High | High | High |
| 12. Sanderstead Recreation Ground | Low | High | High | Medium |
| 13. Shirley Oaks Playing Field and Woods | Low | Low | Medium | Low |
| 14. Shirley Recreation Ground | High | High | High | High |
| 15. Spring Park Wood | Medium | High | Medium | Medium |
| 16. Stambourne Woodland Walk | Medium | High | High | High |
| 17. Temple Avenue Copse | Medium | Medium | Low | Medium |
| 18. The Lawns | Medium | High | Medium | Medium |
| 19. Wettern Tree Garden | Medium | High | High | High |
| 20. Woodcote Village Green | Low | High | High | Medium |

3.11 We have also considered the 82 sites listed by the Council as 'Important Green Spaces'. Brief descriptions of these sites are provided at **Appendix B**.

3.12 YellowSubmarine.io has also ranked 84¹ of the 102 candidate sites to understand their footfall and dwell-time characteristics. We set these rankings out below.

Figure 3-3 Footfall Per Month & Average Dwell time (October 2023)

| Site | Footfall | Dwell time (minutes) |
|--|----------|----------------------|
| Copse Hill Spinney | 82,423 | 15 |
| All Saints Graveyard, Sanderstead | 82,172 | 15 |
| Shirley Recreation Ground | 68,627 | 45 |
| St John's Church/ Shirley Church Recreation Ground | 68,229 | 45 |
| Canterbury Road Recreation Ground | 65,559 | 15 |
| Upper Norwood Recreation Ground | 64,166 | 15 |
| Purley Beeches | 63,152 | 60 |
| Parkfields Recreation Ground | 59,005 | 45 |
| Foxley Wood and Sherwood Oaks | 58,436 | 30 |
| Beaulieu Heights | 57,506 | 15 |
| Pollards Hill Triangle | 57,268 | 45 |
| Woodside Green | 56,904 | 25 |
| All Saints Churchyard, Sanderstead | 56,290 | 15 |
| College Green | 56,064 | 60 |
| Westow Park | 55,974 | 60 |
| Whitehorse Road Recreation Ground | 54,953 | 45 |
| Sanderstead Green and Pond | 54,811 | 15 |
| Higher Drive Recreation Ground | 54,385 | 15 |
| Lower Barn Road Green | 54,070 | 15 |
| All Saints with St Margarets Churchyard, Upper Norwood | 53,792 | 15 |
| Trumble Gardens | 52,694 | 60 |
| Haling Grove | 52,022 | 60 |
| South Norwood Recreation Ground | 51,823 | 60 |
| The Queen's Gardens | 50,456 | 60 |
| Duppas Hill | 50,451 | 15 |
| Coulsdon Memorial Ground | 50,074 | 15 |
| Millers Pond | 49,817 | 45 |
| Wilford Road Playground | 48,002 | 15 |
| Northwood Road Recreation Ground (Playground) | 47,932 | 15 |
| Normanton Meadow | 46,872 | 15 |
| South Croydon Recreation Ground | 46,264 | 60 |
| Chaldon Way Gardens | 45,746 | 15 |
| Thornton Heath Recreation Ground | 44,976 | 15 |
| Auckland Rise Childrens Playground | 43,399 | 15 |
| Stambourne Woodland Walk | 43,241 | 15 |
| Castle Hill Avenue Playground | 43,190 | 15 |

 $^{^{1}}$ No Google geofencing data exists for 18 of the sites and it is not therefore possible to report on those sites.

| Site | Footfall | Dwell time (minutes) |
|---|----------|----------------------|
| Beulah Hill Pond | 42,556 | 15 |
| Freelands Avenue on junction with Tedder Road | 41,733 | 15 |
| Ashen Grove | 40,994 | 15 |
| St John's Memorial Garden (east) | 40,766 | 15 |
| Ashburton Park | 40,745 | 150 |
| Temple Avenue Copse | 39,730 | 15 |
| Sanderstead Plantation | 39,146 | 15 |
| Whitehorse Meadow | 38,979 | 15 |
| Spring Park Wood | 38,974 | 15 |
| Sanderstead Recreation Ground | 38,870 | 15 |
| Apsley Road Playground | 38,590 | 15 |
| Coulsdon Coppice | 38,061 | 15 |
| Roke Playspace | 37,269 | 15 |
| Addiscombe Railway Park | 37,030 | 30 |
| Scrub Shaw | 37,015 | 15 |
| Shirley Oaks Village Playing Field and Wood | 36,527 | 15 |
| Grangewood Park | 36,269 | 60 |
| Pollards Hill | 35,950 | 15 |
| Wandle Park | 35,555 | 15 |
| The Lawns | 35,521 | 15 |
| Oakland Wood | 35,417 | 15 |
| The Ruffet | 35,150 | 15 |
| Wettern Tree Garden | 34,167 | 15 |
| Boulogne Road Playground | 33,193 | 15 |
| Waddon Ponds | 32,936 | 15 |
| Green outside post office, Elmfield Way | 32,666 | 10 |
| St James Church Garden | 32,587 | 15 |
| Coulsdon Coppice Bleakfield Shaw | 31,554 | 15 |
| Roffey Close/ Wontford Road Green | 31,456 | 15 |
| Bourne Park | 30,987 | 15 |
| Park Hill Recreation Ground | 30,183 | 60 |
| Green Lane Sports Ground | 28,848 | 15 |
| Heavers Meadow & allotments | 28,209 | 15 |
| Selsdon Recreation Ground | 27,841 | 60 |
| Rotary Field Recreation Ground | 27,729 | 15 |
| Biggin Woods | 26,827 | 15 |
| Dartnell Road Recreation Ground | 26,680 | 25 |
| St John's Memorial Garden (north) | 25,340 | 15 |
| St Johns Church Memorial Garden | 25,219 | 15 |
| Gordon Crescent Playground | 24,513 | 15 |
| Addiscombe Recreation Ground | 21,026 | 25 |

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| Site | Footfall | Dwell time (minutes) |
|--------------------------------------|----------|----------------------|
| Brickfields Meadow | 19,980 | 15 |
| Allder Way Playground | 18,467 | 45 |
| Woodcote Village Green | 17,777 | 15 |
| Convent Wood | 15,395 | 15 |
| Portland Road Community Garden | 10,114 | 15 |
| Norbury Park | 7,626 | 90 |
| King Georges Field Recreation Ground | 3,048 | 90 |

3.13 Based on the findings summarised in this section, we report on our recommendations in the following section.

4. Recommendations

Local Green Space Candidate Sites

4.1 The Study has sought to consider 20 key sites put forward by the Council against the three key tests for designating Local Green Space at Paragraph 106 of the NPPF.

- 4.2 On the basis of our analysis contained at **Appendix A**, and summarised at Figure 3-2 in Section 3, we find that 11 of those sites have an overall rating of 'high' against the various metrics we have considered, whilst 7 of the sites rank as 'medium', and 2 rank as 'low'.
- 4.3 Our overall assessment is therefore that 18 of the 20 key sites put forward score either 'high' or 'medium' against the NPPF criteria and should therefore be carried forward to proposed designation as Local Green Spaces. These are listed in Figure 4-1.

Figure 4-1 Recommended Sites for Local Green Space Designation

| Site | Overall |
|--|---------|
| 1. Addiscombe Railway Park | High |
| 2. Biggin Wood | Medium |
| 3. Coulsdon Memorial Ground | High |
| 4. Foxley Wood and Sherwood Oaks Field | High |
| 5. Higher Drive Recreation Ground | Medium |
| 6. Millers Pond | High |
| 7. Park Hill Recreation Ground | High |
| 9. Purley Beeches | High |
| 10. Rotary Field Recreation Ground | High |
| 11. Sanderstead Pond (and Green) | High |
| 12. Sanderstead Recreation Ground | Medium |
| 14. Shirley Recreation Ground | High |
| 15. Spring Park Wood | Medium |
| 16. Stambourne Woodland Walk | High |
| 17. Temple Avenue Copse | Medium |
| 18. The Lawns | Medium |
| 19. Wettern Tree Garden | High |

| Site | Overall |
|----------------------------|---------|
| 20. Woodcote Village Green | Medium |

4.4 We have ranked the following 2 key sites as 'low' and would therefore suggest the Council either considers not including these sites in the List for Designation at this time (and designates for protection as Important Green Space); or considers whether, in the light of latest PPG and/or in the light of further qualitative evidence coming forward, there is a sufficiently persuasive case made to "tip the balance" to warrant being proposed for Local Green Space and included in the current Local Plan Review.

Figure 4-2 Sites Recommended for further consideration as to the evidence in support of Local Green Space Designation

| Site | Overall |
|--|---------|
| 8. Portland Road Community Gardens | Low |
| 13. Shirley Oaks Playing Field and Woods | Low |

4.5 The reasons for these two sites being allocated a 'low' overall score is discussed below.

Portland Road Community Gardens

- Proximity to the community (rated Low): The site was recorded as the second least busiest site in terms of footfall
 out of the 83 sites surveyed over the October 2023 survey period. It also had a low dwell-time of 15 minutes for the
 survey period.
- Demonstrably special to a local community (rated Low): The site is not within a Conservation area, does not contain any Listed Buildings, and does not contain any sports facilities. Further, unlike most open spaces which are classified as 'Other Undesignated Open Space', it has a DEFRA classification of 'Built-up Areas and Gardens'.
- Local in Character (rated Medium): The site clearly contributes to the area's local character, however, it is not a distinguished open space area and does not have clear and defensible boundaries.

Shirley Oaks Playing Field and Woods

- Proximity to the community (rated Low): The site was recorded as the 52nd busiest in terms of footfall over the October 2023 period, being within the lower half of the 83 surveyed. It also had a low dwell-time of 15 minutes for the survey period. In addition, there are an above Croydon-average number of larger-sized dwellings in proximity to the park, thereby pointing towards sizable amounts of private amenity space locally. The site is also rated PTAL 0-1a, being towards the lowest level of accessibility by means of transport.
- Demonstrably special to a local community (rated Low): The site does not have any special wildlife designations
 under the DEFRA guidelines, is not within a Conservation area, does not contain any Listed Buildings, and does not
 contain any formal sports facilities.
- Local in Character (rated Medium): The site is said to be a community hub, however, extensive evidence is not available to determine that the site is local in character.

This assessment does not preclude reconsideration of these green spaces in a subsequent local plan review. It is stressed that even without LGS designation, locally cherished and significant local spaces will be identified in the Local

Plan and Policies Map and will continue to be protected from inappropriate development by suitably framed planning policies in the Local Plan Review.

Important Green Space Candidate Sites

- 4.6 Additionally, based on footfall and dwell-time data alone, we have been asked to consider whether any of the sites which currently sit on the 'Important Green Spaces' list would be worthy of further consideration for inclusion within the list of Local Green Sites recommended for designation. We previously ranked footfall and dwell time at Figure 3-3. In Figures 4-3 and 4-4 below, we also highlight the 20 key sites (in blue) to show how their footfall ranks alongside other sites.
- 4.7 Figure 4-3 is notable as some of the site with the highest cumulative monthly footfall are sites which are on the list of 'Important Green Spaces'. The same is also true of the dwell time data.
- 4.8 Cross-referencing these two figures, as well as accounting for our site descriptors at **Appendix B**, the sites which we consider will be worthy of further consideration, based on these factors alone, are as follows:
 - 1. Parkfields Recreation Ground (8th highest footfall / fourth cohort dwell-time)
 - 2. Pollards Hill Triangle (11th highest footfall / fourth cohort dwell-time)
 - 3. College Green (14th highest footfall / third cohort dwell-time)
 - 4. Westow Park (15th highest footfall / third cohort dwell-time)
 - 5. Whitehorse Road Recreation Ground (16th highest footfall / fourth cohort dwell-time)
 - 6. Trumble Gardens (21th highest footfall / third cohort dwell-time)
 - 7. Haling Grove (22nd highest footfall / third cohort dwell-time)
 - 8. South Norwood Recreation Ground (23rd highest footfall / third cohort dwell-time)
 - 9. The Queen's Gardens (24th highest footfall / third cohort dwell-time)
 - 10. South Croydon Recreation Ground (31st highest footfall, third cohort dwell-time)
 - 11. Ashburton Park (41st highest footfall, first cohort dwell-time)
 - 12. Grangewood Park (53rd highest footfall, third cohort dwell-time)
- 4.9 Importantly, these sites have only been assessed in this current Study for their footfall and dwell-time characteristics, as well as the summary information contained at **Appendix B**. They have not been assessed in the same way as the 20 Local Green Space candidate sites (i.e. under each of the detailed NPPF Paragraph 106 tests).



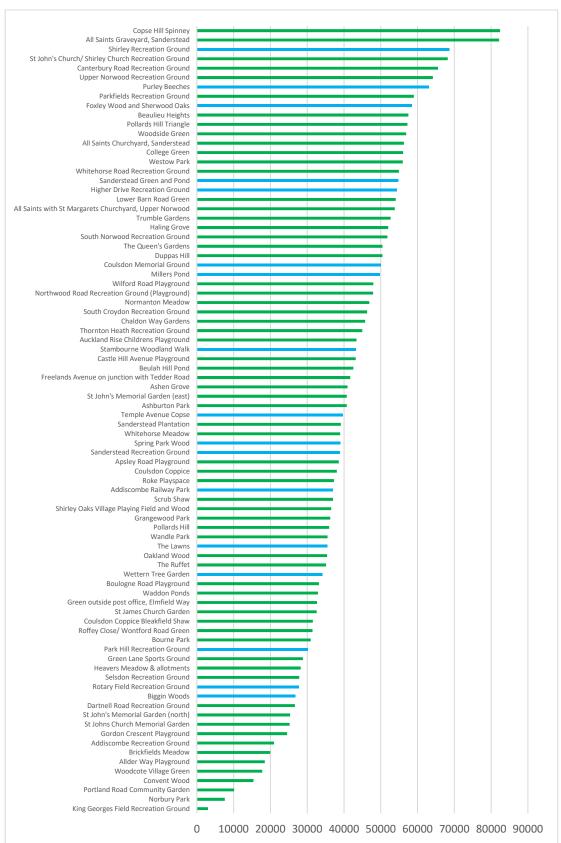
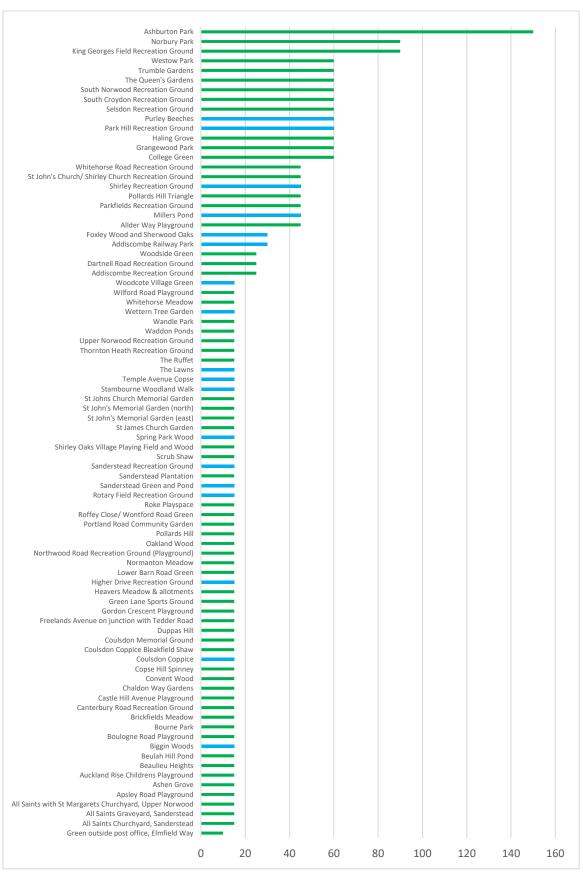


Figure 4-4 Ranked Dwell-time Data (Monthly average Dwell-time, October 2023)



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5. Bibliography

| National Planning Policy Framework (www.gov |
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|---|

- 2. PPG Open space, sports and recreation facilities, public rights of way and local green space (www.gov.uk)
- 3. Open Spaces Society (https://www.oss.org.uk/need-to-know-more/information-hub/local-green-space-designation/)
- 4. CPRE Local Green Spaces 2023 (cpre.org.uk)
- 5. <u>Historic England Championing England's heritage | Historic England</u>
- 6. Croydon Council Local Green Space Technical Note 2019 (croydon.gov.uk)

Appendix A – Local Green Space Candidate Site Appraisals

Appendix B – Important Green Spaces - Site Descriptions

Appendix C – Planning Inspector Report 2018



Nexus Planning

London
Holmes House
4 Pear Place
London, SE1 8BT

nexusplanning.co.uk