

REVIEW OF SPELTHORNE BOROUGH COUNCIL LOCAL GREEN SPACE ASSESSMENT METHODOLOGY

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INTRODUCTION

This document has been prepared in response to the consultation process initiated by Spelthorne Borough Council to review the proposed Local Green Space Assessment Methodology. The consultation runs from Tuesday, 23 April 2019, up until 23.59 on Tuesday, 4 June 2019. The Local Green Space Assessment Methodology draft report can be found here:

<https://www.spelthorne.gov.uk/article/17625/Consultations-and-representations>

Spelthorne Borough Council seeks to remove the existing protection in form of “Public Urban Open Space (PUOS) designation” from some 71 sites across the borough which currently have this status. (The 71 sites are currently set out in Appendix 1 to the Consultation.)

This is in response to Spelthorne Council’s preceding Issues and Options consultation, which expressly asked ‘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.’ Although there were only 167 responses to this question and 56% agreed with removing the PUOS designation, it is clear from comments that the public wanted the PUOS to be deemed Local Green Space (LGS) automatically.

As is evident from the Local Green Space Assessment Methodology draft report, this is not – however - a route that Spelthorne Borough Council is currently proposing. As stated at paragraph 1.9 of the current consultation document, “the PUOS sites will be assessed against the criteria to determine if they should be designated as LGS.”

This hence means that if the PUOS protection is removed, as planned by Spelthorne Council, and the 71 currently protected spaces do not meet the new proposed criteria in the Local Green Space Assessment Methodology draft report, then they will be left without protection, leaving them open to be sold, built on or otherwise modified.

In order to assess the actual impact of the proposed criteria set out in the Local Green Space Assessment Methodology draft report, we have applied the proposed methodology to the 71 PUOS sites to determine how many (if any) would be likely to qualify as Local Green Spaces (and hence continue to qualify for special protection).

ABBREVIATIONS AND ACRONYMS

Abbreviation	Description
ANGSt	Accessible Natural Greenspace Standard
CPRE	Campaign to Protect Rural England
dph	dwellings per hectare
FoE	Friends of the Earth
ha	hectare
LGS	Local Green Space
m	metre
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PUOS	Public Urban Open Spaces

SBC	Spelthorne Borough Council
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

REFERENCES

‘Local Green Space Assessment Methodology’, Spelthorne Borough Council, March 2019¹

‘National Planning Policy Framework’, Ministry of Housing, Communities & Local Government, February 2019²

‘Local List of Buildings and Structures of Architectural and Historic Interest’, Borough of Spelthorne, December 2016³

‘Listed Buildings in Spelthorne’, Spelthorne Borough Council, December 2016⁴

‘Planning: Suburban housing density’, Richard MacCormac, *Architects’ Journal*, October 2011⁵

‘Nature Nearby – Accessible Natural Greenspace Guidance’, Natural England, March 2010⁶

‘Adopted Proposals Map, Development Plan Document’, Spelthorne Borough Council, December 2009⁷

Planning Practice Guidance on Health and wellbeing, the role of health and wellbeing in planning (of 28 July 2017)⁸

Planning Practice Guidance on ‘Open space, sports and recreation facilities, public rights of way and local green space’ of 6th March 2014⁹

THE METHODOLOGY

In its Local Green Space Assessment Methodology Draft report, Spelthorne Council asserts that

¹ <https://www.spelthorne.gov.uk/article/17625/Consultations-and-representations>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

³ <https://www.spelthorne.gov.uk/article/17644/Listed-and-locally-listed-buildings>

⁴ Ibid.

⁵ <https://www.architectsjournal.co.uk/buildings/specification/planning-suburban-housing-density/8620810.article>

⁶ www.ukmaburbanforum.co.uk/documents/other/nature_nearby.pdf

⁷ <http://www.cartogold.co.uk/Spelthorne/Spelthorne.htm>

⁸ <https://www.gov.uk/guidance/health-and-wellbeing>

⁹ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

its process for designating spaces as Local Green Spaces “will be in line with national policy and guidance in so far as this is applicable”.

For this reason, this assessment will also assess the proposed criteria and methodology against the ‘National Planning Policy Framework’ (NPPF) of February 2019 and applicable Planning Practice Guidance.

National Planning Policy Framework

The ‘National Planning Policy Framework’ of February 2019 allows for the designation of Local Green spaces and provides as follows:

99. 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

100. 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.

101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.”

Local Green Space Assessment Methodology Draft report

In its Local Green Space Assessment Methodology Draft report, Spelthorne Borough Council has set out the test that they plan to employ to assess the value of a site to be designated a Local Green Space and proposes using five criteria (5). These are:

- Beauty
- Historic significance
- Recreational value
- Richness of wildlife
- Tranquillity

The Consultation document suggests that each criterion be marked out of 5, with a maximum potential of 25 points. The methodology adds another restriction, in that only sites that score 13 or more will be **considered** for approval as a Local Green Space. However, a site that scores 5 in any two (2) of the criteria will also be deemed worthy of consideration.

As stated at para.3.6 of the Consultation:

“3.6 In designating an area as Local Green Space it is proposed that if an area achieves over 50% of the total available ‘points’ e.g. a total score of at least 13 out of the 25 available, then it would be considered for designation. **This is because it would need to score highly against at least three criteria.** Alternatively, if an area scores maximum points (5) against two criteria, but does not score at least 13 points overall, it will also be considered for designation due it scoring so highly against those criteria.”

Moreover, the consultation document states that sites will not be considered automatically, placing the onus on the local community to provide supporting evidence and argue for a site to be assessed.

There are two additional factors specified by Spelthorne Borough Council namely size and distance. We will be addressing the individual criteria (including size and distance) below. An assessment of all the 71 areas against the proposed criteria is contained in appendix 1.

Size

The Spelthorne Council’s Assessment Methodology sets out a minimum and a maximum size for designation as a Local Green Space’ (see paras.3.8 & 3.9):

“3.8 As a guideline, the Council will not seek to designate any land which is larger than 10ha (approximately 24 acres).

3.9 The minimum threshold proposed is any area below 0.25 hectares (0.6 acres) would not be designated.”

This is expressly contrary to the Planning Practice Guidance on *Open space, sports and recreation facilities, public rights of way and local green space* of 6th March 2014 which states:

“Is there a minimum area?

Provided land can meet the criteria at paragraph 100 of the National Planning Policy Framework **there is no lower size limit for a Local Green Space.**¹⁰”

If a minimum threshold is adopted, this will exclude fourteen (14) of the 71 currently protected PUOS sites (set out in Appendix 1 of the methodology) simply on the basis of size. The excluded sites range in size from 0.24ha down to 0.07ha. Of those 14, one is owned by the Church of England, five by Spelthorne Council whilst the remainder's ownership is apparently unknown (but presumably privately owned).

The adoption of a minimum size threshold would mean that nearly 20% of the currently protected sites would lose their protection from development.

We believe that such designation/restriction based on size would be unlawful as contrary to the National Planning Guidance.

¹⁰ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

Consultation Justification for Minimum Size

It is also worth addressing the Council's justification for the minimum threshold namely that 0.25 (0.6 acres) "represents the size of an area which can accommodate one residential unit."

It follows that Spelthorne Borough Council applies a housing density in its assessment of 4 dwellings per hectare (dph). However, this is clearly at odds with the current national average which is 32dph, eight times that of Spelthorne.

"It is important to point out that each of our family housing typologies was designed to maximise density and effective land use. For example, the maximum density of detached housing was found to be about 35 dwellings per hectare, two-storey semi-detached and short terraces about 50dph, and mews housing about 80dph ... non-family apartments achieve a density of up to about 130dph, and are deliberately limited to a height of four to five storeys." (Richard MacCormac, *Architects' Journal*, 6 October 2011).

A detached house requires less than 0.03 hectares, not the 0.25 hectares applied in the Methodology. (If one were to build a five-storey apartment building, only a factor of less than 0.008ha would be applied. Therefore, on even the smallest of the 71 PUOS sites, a developer could erect a building of eight to ten single-bedroom flats.)

Distance

The Methodology suggests that any areas that are further than 300 metres from communities and land which is private and where there is no public access be ineligible for designation as a local green space "unless there is clear evidence of its importance" (para.2.5).

The methodology has appropriated the distance from Natural England's 'Accessible Natural Greenspace Guidance' as a measure of proximity of the local community to the assessed Local Green Space. This is a misinterpretation (or misrepresentation) of Natural England's guidance.

Natural England has set out a list of demands in terms of an increasing access to green spaces as expressed in its Accessible Natural Greenspace Standard (ANGSt) as follows:

"English Nature believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of greenspaces providing for a range of recreational needs. English Nature recommends that provision should be made of at least 2ha of accessible natural greenspace per 1000 population according to a system of tiers into which sites of different sizes fit:

- no person should live more than 300m from their nearest area of natural greenspace;
- there should be at least one accessible 20ha site within 2km from home;
- there should be one accessible 100ha site within 5km;

- there should be one accessible 500ha site within 10km.”¹¹

The designation of 300m to the nearest green space has been chosen by Natural England as it is the maximum distance that the majority of parents would allow their children to walk unaccompanied.

But it is clearly evident from this that the 300m do not set out as a **maximum** standard for access to Green spaces, meaning that green space that is further removed can be left without protection from development - the contrary is true. In fact, the methodology appropriates this standard to attempt to achieve the opposite than what it sets out to do.

We believe that the designation of the 300m distance (as a **limit** for designation as a Green space) is entirely inconsistent with this guidance which local authorities should apply.

General Analysis of Specific Criteria

In setting out the specific criteria in the consultation document, Spelthorne Council asserts that they have taken into account the ‘National Planning Policy Framework’ (NPPF) of February 2019¹² as well as Planning Practice Guidance (PPG).¹³

First of all, it is notable that the NPPF does not **restrict** the criteria to 5 criteria only (beauty, historic significance, recreational value, richness of wildlife and tranquillity) – it is evident from para.100 that this is a **non-exhaustive** list why land may merit protection and may be of special value to a local community.

Furthermore, it is also clear from the NPPF that only **one** of the criteria would/should be sufficient to warrant protection (not a high score “against at least 3 criteria” as set out in the Consultation document).

As stated in para.100 NPPF:

“100. The Local Green Space designation should only be used where the green space is:

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; ...”.

On the points system developed by Spelthorne Borough Council, it is evident that (in order to even be **considered** for designation as a Local Green Space, a space will have to score 13 points or more or highly in two categories. The scoring required (at a maximum score of 5 points per category) clearly means that the Consultation document requires a for a more onerous burden to be met where Green Spaces need to score (highly) across **several** criteria, not simply across one criterion as set out in the NPPF – and hence fails to properly stay within the remit of the NPPF.

¹¹ <http://publications.naturalengland.org.uk/publication/65021>

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf

¹³ <https://www.gov.uk/government/collections/planning-practice-guidance>

Scoring across different criteria (let alone highly against 3 out of 5 different criteria) is further complicated by the fact that several of the criteria are effectively mutually exclusive:

- (1) recreational value (para.3.3) and richness of wildlife (para.3.4)
- (2) recreational value (para.3.3) and tranquillity (para.3.5)¹⁴

As further set out below, bearing in mind the area of Spelthorne, the maximum possible score in relation to the criterion of 'historic significance' is 1 point.

In addition, there are several comments to make in relation to the individual criteria set out as interpreted by Spelthorne Borough Council.

Beauty

'Beauty is in the eye of the beholder.' The beauty, or visual attractiveness, of a site risks – by definition - to be a very subjective assessment.

This problem is not addressed – but further exacerbated – by the points system set out by Spelthorne which rates beauty on a scale of 1-5 with 5 points requiring “**excellent** visual attractiveness, **excellent** variety of natural features **and** of good quality, provides an excellent **contribution** to the setting of the local area.”

It is evident from this specific definition that to score a maximum for beauty, it is not enough for an area to be considered 'generally beautiful' or have to “excellent visual attractiveness”, it would need to show four (4) cumulative and necessary elements i.e.

- (i) “excellent visual attractiveness,
- (ii) “excellent variety of natural features” (where neither variety nor what is meant by “natural features” is further defined)
- (iii) These features need to be of “good quality” and
- (iv) They further have to provide “an excellent” (nor merely good or great) “contribution to the setting of the local area”

Hence what may – on first sight – be considered a more straightforward principle – i.e. to determine what spaces are valued by a community as a result of their **beauty** – would now have to meet four specific & onerous criteria to be considered as such.

Historic Significance

The methodology sets out five sub-criteria by which the historical significance is assessed and then provides that per each of the sub-criteria met, the site will receive one point.¹⁵

Simply, a site scores a point for each of the following criteria:

- It is located in an area of high archaeological potential
- It makes a positive contribution to the setting of a locally listed building

¹⁴ In order for a site to have a high recreational value, it will need to be busy and active and will, by definition, not be tranquil. A site ranking highly on tranquillity requires “no visual or audible intrusion” or “low levels of noise or visual intrusion from... recreational activities” to score 5 or 4 points respectively (p.10).

¹⁵ P.7/8 of the Consultation document

- It makes a positive contribution to the setting of a nationally listed building
- It makes a positive contribution to the setting of a scheduled ancient monument
- It makes a positive contribution to the setting of a conservation area

In order to score maximum points (i.e. 5 points), an area would not only need to be located in (1) an area of high archaeological potential, but it would need to contain requisitely (2) a locally listed building, (3) a nationally listed building as well (4) a scheduled ancient monument and (5) be located in or just outside a conservation area. This alone is not sufficient: as the criteria makes clear, in order to qualify for each of those points, it needs to be shown that the Green space make a “**positive** contribution” to the setting to each of the all of the above (which introduces a subjective criterion to the otherwise objective criteria).

As is clear from the analysis of each site, **only eight** (8) of the 71 protected urban open spaces in Spelthorne are potentially¹⁶ able to score a maximum of **one** point for historical significance (which reduces the maximum possible score against which all existing PUOS sites can be assessed to 21).¹⁷

The corollary of the methodology and the sub-criteria is that the Methodology does not recognise that sites can have historic significance in their own right.

For example, Shepperton Cemetery¹⁸ can score a maximum of 1 point for Historic Significance because it is inside the Shepperton conservation area, but the methodology does not provide for a points allocation for the age of the cemetery, nor for the fact that it contains the graves of Thomas Love Peacock, 1785-1866, novelist and poet, and William Schaw Lindsay, 1817-1877, Lord of the Manor of Shepperton and hence possesses local historic significance.

The methodology also does not recognise the potential historic nature of the green space themselves.

As a result of the highly specific and onerous criteria, the Spelthorne Consultation adopts a much narrower remit (and hence much more onerous criteria) than the overarching National Planning Policy Framework (NPPF) which states:

184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

As a result of the narrowly defined and very onerous criteria set out, it is evident that the Consultation report fails to recognise the importance of sites of local historic value, fails to recognise the “desirability of sustaining and enhancing the significance of heritage assets” and

¹⁶ Subject to having to meet the additional criterion of being considered to make “a positive contribution to the setting” in question.

¹⁷ It is arguable that to establish fair and reasonable criteria to measure a site as suitable to be designated a Local Green Space it should be possible for any site across Spelthorne to score maximum points in any one criterion. This is impossible for historical significance.

¹⁸ Appendix 1, E13

“the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring” and fails to set out “a positive strategy for the conservation and enjoyment of the historic environment” in Spelthorne as required by the NPPF¹⁹.

We hence believe that the methodology adopted is seriously flawed for these reasons.

Recreational Value

For the authors of the Assessment Methodology, recreational value only derives from the variety of activities and the number of people who take part as evidenced by the criteria set out in para.3.3 which states that “a Local Green Space would normally be more than just an informal play area or grassed pitches”.

As can be seen from the Methodology (p.9), the recreational value of a site is greatly determined by the quality of its “facilities”. For a green space to score 5 for its recreation value, for example it has to evidence “**excellent** facilities (good/excellent condition and range)”.

Therefore, the criterion for recreational value is based upon the number and variety of sports available and the quality of these facilities (such as pitches, play equipment, etc), as well as reliance on a subjective assessment of whether the facilities are considered of a good enough quality **and** range to merit protection.

Spaces without recreation facilities can only gain up to 2 points which provides little recognition of the recreational value of green spaces as just green spaces.

Thus, recreational activities such as engaging in ball games, outdoor fitness activities (which do not require additional facilities), pilates/yoga, playing Frisbee, jogging, or taking a walk, walking the dog, enjoying the green space for itself, watching wildlife, taking time out to relax, meeting friends, sunbathing, etc are given little value in terms of recreation (and certainly not sufficient to play a significant role in designation as a local green space which requires 13 points to qualify for **consideration** alone).

As such, the consultation does not appear to accord real value to the features that are most valued by residents and the fact that with the increasing density of modern living, a green space becomes important and vital to the local community in that it is just ‘not indoors’. No points are provided for spaces without public access that may e.g. provide a visual and environmental benefit.

Furthermore, the consultation attaches no inherent value to “formal recreational facilities” and allotments (which are currently protected under the PUOS designation). As stated at para.3.3 of the methodology:

“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.”

¹⁹ para.184 & 185

This is at odds with (and fails to implement) several of the overarching objectives for sustainable development as set out in the NPPF namely the “social objective” which stresses the importance of supporting “strong, vibrant and healthy communities” and the need for “open spaces that reflect current and future needs and support communities’ health, social and cultural well-being” (NPPF, para.8(b)). It contradicts, in particular, the specific guidance contained in para.91 NPPF which states (under the heading of “Promoting healthy and safe communities”):

91. Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

a) **promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other ...; [and]**

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of **safe and accessible green infrastructure**, sports facilities, local shops, access to healthier food, **allotments** and **layouts that encourage walking** and cycling.”

The express failure to value and protect allotments also fails to take into account the Planning Practice Guidance on ‘Health and wellbeing’ of 28th July 2017 and actively contradict this. As stated in the Planning Practice Guidance:

“How can planning help create a healthier food environment?”

Planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role in enabling a healthier environment by supporting opportunities for communities to access a wide range of healthier food production and consumption choices. ... Policies may also request the **provision** of allotments or allotment gardens, to ensure the provision of adequate spaces for food growing opportunities.”²⁰

Evidential burden

In addition, the methodology makes clear that in order to attract a rating of beyond 2 points, those making the case for a space to be protected as a Local Green Space will need to provide formal “**evidence**” of frequent use.

This means that there is an evidential **burden of proof** which will need to be discharged by persons arguing that local green spaces should be protected on the basis of their recreational value. Pure assertions based on local knowledge or anecdotal evidence will not be sufficient to discharge that burden and spaces in relation to which no evidence has been provided can attract a maximum of 2 points only.

This raises the particular issue of inequality of arms (between Councils, public bodies and developers/business and residents/the public) where the burden of proof lies on residents to adduce proof that (1) may be difficult to adduce in the first place (no information has been provided in the consultation document as to what amounts to acceptable evidence),

²⁰ <https://www.gov.uk/guidance/health-and-wellbeing>

(2) studies showing evidence of informal and formal use may be costly and time consuming to produce.

Richness of Wildlife (or Biodiversity)

Under 'Richness of Wildlife' (paragraph 3.4), although the authors recognise the importance of "mature trees, ponds, hedgerows, riverbanks" in the support of wildlife, these are not deemed worthy of protection in their own right.

The scoring of this criterion is considerably based upon the **evidence** of wildlife observed combined with the **location** of the area (close proximity to any designated area of ecological significance, area of local ecological importance of Local Nature Reserve, site of national significance i.e. Site of Special Scientific Interest or site of international importance i.e. Special Protection Area or RAMSAR site).

This means, however good the evidenced biodiversity of the site or its "particular local significance because of its importance to wildlife", it can only score 2 points if it is not in close proximity to a "designated area of ecological significance."

In order to score 3 points the green space must be "located in close proximity to, or is designated as, an area of local ecological importance of Local Nature Reserve."

Applying this to Spelthorne, there is only one designated Local Nature Reserve in the borough of Spelthorne at Ash Link, Shepperton. Therefore, there is very little prospect that any site can obtain 3 points.

To score 4 points, a local green space must be "in close proximity" to an area of Special Scientific Interest, and with a "good level of evidence" of wildlife observed. There are three Sites of Special Scientific Interest (SSSI) in Spelthorne:

- Staines Moor
- Shortwood Common
- Dumsey Meadow

However, although not recorded as a site of special scientific interest by Spelthorne Borough Council as such, the River Thames is a SSSI. Therefore, a PUOS that adjoins the Thames can score 4 points for its "close proximity to a site of national significance i.e. Site of Special Scientific Interest."

To score the maximum 5 points the green space must be "in close proximity" to a Special Protection Area (SPA). There are three in Spelthorne:

- Wraysbury Reservoir
- Staines Reservoirs
- Red House Reservoir (Kempton Park)

Within Appendix 1, E2 at the junction of Jordans Close and Town Lane, is approximately 100 metres from the boundary of Staines Reservoir; A6, the eastern end of Lauser Road, is approximately 150 metres from Staines Reservoir; and D6 the green space in Selwood Gardens, is within 100 metres of the boundary of Staines Reservoir.

However, even if a site would potentially qualify for more than one point based on location, a “good (level of) evidence” in relation to wildlife observed on site would need to be adduced.

At present, there exist no studies as to the proliferation and existence of wildlife on currently protected spaces in Spelthorne.

The requirement of adducing “a good level of evidence” hence raises again the issue of the evidential burden of proof being placed on communities to argue for the protection of valuable Green spaces (see also in relation to ‘recreational value’) which raises issues of fairness and equality of arms. Scientific wildlife studies are likely to be extremely expensive and hence not within the reach of residents, residents’ associations, etc. It is clear, however, that without such evidence a site can only score a maximum of 1 point for “as assumed level of wildlife value to the site (habits or species)” (p.9).

Even if studies could be obtained, the methodology further introduced a subjective concept by referring to a “**good level** of evidence” without specifying what this would mean in practice.²¹

Without the scientific evidence at present, the maximum score possible for currently protected PUOS sites is 1.

Tranquillity

The requirements for tranquillity scores are set out at p.10 of the Consultation document.

As stated at 3.5 of the Consultation document:

“The Borough’s proximity to Heathrow Airport alongside the M25 and M3 motorways play a role in significantly reducing tranquillity in most parts. It is for this reason that the tranquillity attributes have been produced and sites have been **assessed** in context of the points above.”

Nonetheless, it appears that the individual criteria (and points allocation) for tranquillity do not make sufficient allowance for vehicle noise and over-flying aircraft. With the volume of traffic in the borough associated with Heathrow airport and aircraft noise, few sites can be expected to score high marks for tranquillity on the basis of the criteria set out bearing in mind also that many of the concepts are imprecise and subjective (e.g. “limited”, “some”, “major”, “frequent” disturbance) and hence at risk of being very restrictively applied by Spelthorne Council.

Furthermore, as mentioned above, the criteria set out for tranquillity mean that they are largely incompatible with a high score on recreational value (see above). A site ranking highly on tranquillity requires “no visual or audible intrusion” or “low levels of noise or visual intrusion from... recreational activities” to score 5 or 4 points respectively (p.10).

This further renders it more difficult for a space to rank highly in relation to 3 (or 5) criteria to be considered for designation as a Local Green Space.

²¹e.g. would a site that provides excellent nesting for just one species of bird meet this test or a site that provides adequate nesting for several species?

ASSESSMENT

Where possible each of the 71 PUOS sites has been visited and assessed against the criteria of the draft Methodology. The individual site assessments are recorded and scored in Appendix 1.

CONCLUSIONS

As set out above, the proposed Methodology provides in paragraph 3.6, that 13 points are required to be considered for designation as a Local Green Space:

“if an area achieves over 50% of the total available ‘points’ e.g. (sic) a total score of at least 13 out of the 25 available, then it would be **considered** for designation” (italics added).

Using the proposed Local Green Space Assessment Methodology and being generous with the subjective scores of beauty and tranquillity, **none** of the 71 PUOS sites meets the required **13** points which would enable them to be advanced for **consideration** by the council (let alone being guaranteed designation).

As set out in the assessment, the 71 sites currently protected by the PUOS designation would score between 0-12 points on the criteria advanced by Spelthorne Council with the overwhelming majority of sites scoring less than 7 points.

0 Points: 16 sites
1 Point: 0 sites
2 Points: 0 sites
3 points: 1 site
4 points: 6 sites
5 points: 20 sites
6 points: 9 sites
7 points: 6 sites
8 points: 4 sites
9 points: 4 sites
10 points: 2 sites
11 points: 2 sites
12 points: 1 site
13-25 points: 0 sites

The median score is 5 points in total, the mean (average) is 4.88 points. Applying the specific points-based system set out in the consultation, average score for Beauty is 1.41 points, 0.12 points for Historic Significance, 1.43 for Recreational Value, 0.98 for wildlife and 2.25 for tranquillity. (Each criterion would need to average at least 2.6 to reach the 13 points required for consideration as a Local Green Space.

Equally, no site is able to score highly across **three** criteria and only **one** site (E7 – Riverbank Flats, Laleham Road) has been assessed as scoring the maximum points (5 points each) across **two** criteria on the basis of a generous allocation in relation to ‘tranquillity’ and ‘beauty’ (arguably the most subjective criterion) reaching a total of 12 points.

Of course, “consideration for designation” as a Local Green Space does not guarantee actual designation as a Local Green Space.

As is evident from the detailed assessment only **one** of the 71 public open urban spaces in Spelthorne can potentially currently meet the criteria for designation as a local green space.

It hence follows that the proposed criteria do not constitute appropriate criteria to fulfil the purpose of allowing local communities to “protect green areas of particular importance to them” (NPPF, para.99).

The criteria proposed by Spelthorne Council either fail to account for the **reality of Green spaces within Spelthorne** (including green spaces that have been designated as “public urban open spaces” **because** they have considerable value to the community) or, worse, have been specifically and deliberately phrased in a way that will deprive currently protected spaces from protection against development.

In terms of individual criteria, as is evident from the analysis, not a single site in the borough can satisfy the maximum score for **Historical Significance**. A site would have to be in an area of high archaeological potential as well as in a conservation area, and to have within its boundary a locally listed building, a nationally listed building **and** a scheduled ancient monument – as well as contribute to their settings.

To score five points for **Recreational Value**, the site would need to be open to full public access, with excellent sports facilities for free. As soon as an entrance fee is required or membership (or restricted to residents or school students), then only one point is scored. Again, no site in the borough would meet this standard.

To be able to score more than 1 point for **Richness of Wildlife** (or biodiversity), a site must be in close proximity to an already recognised area of ecological significance as well as be supported by “good evidence in relation to wildlife observed” – such evidence does not exist at present. The biodiversity of a local green space has not been given value in its own right, such as the Sweep’s Ditch, River Ash, Shepperton Cemetery and other sites across the borough.

No value itself is attached to the fact that a space is a local green space of value to the community.

The proposed Local Green Space Assessment Methodology is supposedly based upon paragraphs 99 and 100 of the National Planning Policy Framework (NPPF), and Spelthorne Borough Council (SBC) proposes the identification of Local Green Spaces (LGS) to replace the current Protected Urban Open Space (PUOS) designation.

However, the referenced section (“Open Space and Recreation”) of the NPPF does not intend the designation of an LGS as the replacement of PUOS.

Moreover, the Methodology ignores the preceding paragraphs in the section of the NPPF, of which Paragraph 97 clearly states that

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

The implication is that existing open spaces **should** be protected, and that the onus is on the Council or developers to justify the removal of that protection, not for all protections to be removed and then for the local community to bear the burden of proof to make a case for their reinstatement.

Furthermore, paragraph 96 of the NPPF looks to councils to increase and enhance open spaces.

“Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) **and opportunities for new provision**. Information gained from the assessments should be used to determine what open space, sport and recreational provision is **needed**, which plans should then seek to accommodate.”

The NPPF also recognises that open space is needed separately and not just for its accommodation of sport and recreational facilities. The Spelthorne Methodology ignores in the assessment the importance of **an open space as an open space** without sport and recreational facilities.

As such, the consultation fails to give value to open urban and open green spaces as playing a vital role for ‘**sustainable** development’ and its role in supporting humans and the planet including the overarching environmental objective “to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to **climate change**, including moving to a low carbon economy” (NPPF, para.8).

As further stressed at para.118 of the NPPF, “planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and **taking opportunities to achieve net environmental gains** – such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that **some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; ...**”

The Consultation fails to give any importance or value to these functions including the fact that every green space sequesters carbon, i.e. removes carbon dioxide from the atmosphere which plays a vital role in counteracting the threat of irreversible climate change and hence has a significant wider public, health and environmental benefit.

It is submitted that the Methodology proposed by Spelthorne Council is not only fundamentally flawed for the reasons set out above, but also unlawful by failing to take into account and applying the National Planning Policy Framework and applicable Planning Practice Guidance.

RECOMMENDATIONS

Based on the above conclusions, the authors of the report are calling on Spelthorne Council to:

- (1) **automatically** protect and designate **all** existing 71 public urban open spaces (in Appendix 1 of the consultation document) as Local Green Spaces (LGS),

In relation to the designation of **additional** Local Green spaces, Spelthorne Council is called upon to:

- (2) Pro-actively protect **all** green spaces in Spelthorne irrespective of their size and distance from communities i.e. no minimum or maximum size thresholds & maximum distance from the community for an area to be denoted as Local Green Space,
- (3) abandon the highly restrictive and onerous points-based system and points allocation proposed in the Consultation,
- (4) simplify the process and adopt as the **only** criterion the “**value to the local community**” or wider public benefit (by reference to non-prescriptive and non-exhaustive reasons),
- (5) Provide Green space protection also on the basis of carbon sink potential and carbon sequestration,
- (6) Assume the evidential burden for proving that an area is **not** of local or public benefit (e.g. in terms of carbon sequestration, richness of wildlife, recreational use, beauty or historic value) and not impose this burden on local communities to adduce evidence to the contrary,
- (7) Not to insist on public access as a necessary criterion for Local Green Space designation nor to attach less value as a result of lack of public access (as even spaces without public access have considerable public benefits such as richness of wildlife (fauna & flora), visible & audible benefits, contribution to tranquillity and shielding against noise, aiding air quality and acting as a carbon sink),
- (8) ensure that Local Green spaces in public ownership remain in public ownership,
- (9) protect existing rights of way unless there are specific reasons in relation to wildlife (necessary protection of fauna & flora)

APPENDIX 1 – Individual Site Assessments

Council-owned Parks and Recreation Grounds

A1. Alexandra Road, Ashford

Beauty: An expanse of grass with some mature and some new trees, limited variety - 1

Historic Significance: None - 0

Recreation Value: Public access but with limited recreation facilities, a set of goal posts, and no evidence of frequent use - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: frequent disturbance, limited screening with disturbance from local roads - 2

A2. Ashford Recreation Ground, Clockhouse Lane, Ashford

Beauty: Limited variety of natural features, an expanse of grass with trees and a few bushes - 1

Historic Significance: Clock tower is a locally listed building – 1 (on the premise that the green space is deemed to meet the additional requirement of “making a positive contribution to the setting” of the building – otherwise 0 points)

Recreation Value: Public access with a limited variety of facilities (tennis, basketball, children’s play area), assumed that evidence of reasonably frequent use will be collected - 3

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: some disturbance, size of the space enables visitors to move away from the majority of the disturbance of traffic on Clockhouse Lane - 3

A3. Cedars Recreation Ground, Green Street, Sunbury

Beauty: Limited variety of natural features but good quality - 2

Historic Significance: The war memorial is a locally listed monument inside the grounds – 1 (on the premise that the green space is deemed to meet the additional requirement of “making a positive contribution to the setting” of the monument – otherwise 0 points)

Recreation Value: Public access with a limited variety of facilities (tennis, basketball, children’s play area), assumed that evidence of reasonably frequent use will be collected - 3

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Frequent disturbance from traffic on the busy Green Lane, with no screening - 2

A4. Feltham Hill Road, Ashford

Beauty: A bland expanse of grass with a few trees and skeletal bushes - 1

Historic Significance: None - 0

Recreation Value: Public access with only a children's play area - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: frequent disturbance, no screening from traffic noise on Feltham Hill Road, but parts of the site allow to move away from major/constant disturbance - 2

A5. Groveley Road, Sunbury

Beauty: A bland expanse of grass surrounded by trees and hedgerows, limited variety of natural features - 1

Historic Significance: None - 0

Recreation Value: Public access to site and a children's play area - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: frequent disturbance, site is large enough to get away from major & constant traffic noise from the busy Groveley Road - 2

A6. Lauser Road (eastern end), Stanwell

A 0.09ha patch of grass, with a free-standing gate and evidence that there may have been swings some time ago. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

A7. Scott Freeman Gardens, Church Road, Ashford

Beauty: A triangle of grass with several trees and two raised flower beds in need of tidying - 1

Historic Significance: None - 0

Recreation Value: Public access but with no recreational facilities, other than some park benches close to the road (and hence close to traffic noise and pollution) - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: major and constant disturbance as at the busy junction of Church Road and Stanwell Road - 1

A8. Staines Park, Knowle Green, Staines

Beauty: A bland expanse of grass with some trees and hedges, but with the overgrown Sweep's Ditch to add some character; limited visual attractiveness - 1

Historic Significance: None - 0

Recreation Value: Bowling club and miniature railway limited to members only; it is assumed that evidence can be collected of frequency of use of tennis courts, children's play area, dog walking and visitors by the local community – 3 (if no such evidence can be collected, then 2 points)

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Some disturbance, site is large enough to get away from traffic noise and feature undisturbed parts- 3

A9. Stanwell Recreation Ground, Oaks Road

Beauty: Limited variety of natural features but of good quality - 2

Historic Significance: None - 0

Recreation Value: Bowling club limited to members only; it is assumed that evidence can be collected of frequency of use of tennis courts, children's play area, dog walking and visitors by the local community - 3

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Site is well screened from local roads, but susceptible to aircraft noise - 3

A10. Village Park, Hadfield Road, Stanwell

Beauty: A limited variety of natural features, a large expanse of grass with trees and hedgerow along northern edge - 1

Historic Significance: None - 0

Recreation Value: Public access with only a children's play area - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: some disturbance, site is large enough to get away from traffic noise and so has undisturbed parts - 3

A11. Memorial Gardens, Staines

Beauty: Subjective quantification of visual attractiveness, could be 1 to 3 score on personal preference, generous score as an oasis of green in Staines town centre - 3

Historic Significance: Inside Staines conservation area – 1 (assuming that it is considered to “make a positive contribution to the setting” of the conservation area)

Recreation Value: Public access, but no quantified evidence of use - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Some disturbance from traffic and car park, and possibly from future development (if approved), but site is large enough to get some distance away from noise - 3

A12. Spelthorne Grove, Sunbury

Beauty: Natural features limited to a screen of trees separating the area of grass from the access road to Sunbury Tesco - 1

Historic Significance: None - 0

Recreation Value: Frequently used children's play area – 3 (assuming that this can be supported by evidence/information)

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: major and constant disturbance from traffic on the access road to Sunbury Tesco - 1

A13. Holywell Way, Stanwell

Beauty: A housing development, with minimal green space - 1

Historic Significance: None - 0

Recreation Value: Public access available to green space with negligible recreational facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Frequent disturbance from local traffic throughout the day - 2

A14. Studio Road, Shepperton

A 0.19ha plot with a patch of grass and fenced off children's play area. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

A15. Glebeland Gardens, Shepperton

Beauty: A large open tract of grass, surrounded by trees and some hedgerows - 1

Historic Significance: None - 0

Recreation Value: Public access with a children's play area - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Set away from any busy main roads, but limited disturbance on part of the site - 4

A16. Former line of Lower Sunbury Relief Road (TP26)

Beauty: Limited natural features but good quality of mature trees and hedgerows - 2

Historic Significance: None - 0

Recreation Value: Public access to a path along through the site, no other recreational facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Screened away from local housing but bisected by some local roads, but away from the roads there is limited disturbance - 4

Private Sports Grounds

B1. Ashford Sports Club, Woodthorpe Road, Ashford

Beauty: No longer a cricket club, but a housing estate, The Wickets - 1

Historic Significance: None - 0

Recreation Value: A children's play area only accessible from inside The Wickets, no general public access - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: A residential area bounded by the busy Woodthorpe Road and Chesterfield Road, but away from these roads there is limited disturbance; some aircraft noise - 4

B2. Lazards Sports Club, The Avenue, Sunbury

Beauty: Large open sports field surrounded by trees and some hedgerows, limited natural features - 1

Historic Significance: None - 0

Recreation Value: Private sports club - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Not assessed, but disturbance anticipated from local roads and games in progress - 2

B3. Gaflac Sports Ground + London Irish RFC, The Avenue, Sunbury

Beauty: Large open sports field surrounded by trees and some hedgerows, limited natural features - 1

Historic Significance: None - 0

Recreation Value: Private sports club - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Not assessed, but disturbance anticipated from local roads and games in progress - 2

B4. Elmsway Tennis Club, Elmsway, Ashford

Beauty: Very limited natural features with trees and hedgerows surrounding the site - 1

Historic Significance: None - 0

Recreation Value: Access to members only - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: site is tucked away from the busy Fordbridge Road down an unmetalled private road with some housing around the site and Ashford Manor Golf Club on one side, however it is disturbed by aircraft noise – 4.

School Grounds

School grounds (C1 to C12) are open expanses of sports fields of mainly grass surrounded by fencing with trees and hedgerows. Only C3, C4 and C8 were inspected in detail. A number of the remainder were noted in passing in the course of this analysis.

Beauty: Very limited natural features, a large expanse of grass for various sports pitches and surrounded by fencing with some trees and hedges - 1

Historic Significance: None - 0

Recreation Value: No public access, only available to “a limited group of people”, the school students - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Frequent disturbance, it is a school - 2

C3. R/O Spelthorne College, Church Road, Ashford

The Public Urban Open Space is now the largest building site in Ashford.

C4. Staines Prep School, Gresham Road, Staines

Gained an extra point for Historic Significance because part of the school buildings is locally listed.

C8. St Nicholas School, Shepperton

Although only about 100m from Spelthorne’s only Nature Reserve site, there is a patch of grass surrounded by some trees.

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

Three large post-Second World War housing estates with scattered pockets of greenery to break up the monotony of houses.

Beauty: Limited attractiveness of patches of grass and the occasional tree or bush to break up the monotony - 1

Historic Significance: None - 0

Recreation Value: Public access but negligible recreation facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: No self-containment or screening with constant disturbance from local roads - 1

D4. Belgrave Road/Batavia Road, Sunbury

Beauty: Limited attractiveness of patches of grass and the occasional tree or bush to break up the monotony, although Batavia Road has a line of mature trees along a central reservation - 1

Historic Significance: None - 0

Recreation Value: Public access but negligible recreation facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: No self-containment or screening with constant disturbance from local roads - 1

D5. Preston Road/Greeno Crescent, Shepperton

Beauty: Limited attractiveness of patches of grass and the occasional tree or bush to break up the monotony - 1

Historic Significance: None - 0

Recreation Value: Public access but negligible recreation facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: No self-containment or screening with constant disturbance from local roads - 1

D6. Selwood Gardens, Stanwell

Beauty: Improved visual attractiveness to what could have been a bland plot of grass; varieties of trees, bushes, shrubs and flowers have been planted to improve the site - 2

Historic Significance: None - 0

Recreation Value: Public access but no notable recreation facilities, a park bench - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Site is not large enough to escape disturbance from the busy Park Road (B378) route to Heathrow, however there is some limited screening - 2

D7. Strodes Crescent, Staines

Beauty: A crescent shaped area of grass shaded by mature trees - 2

Historic Significance: None - 0

Recreation Value: Public access but no notable recreation facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Constant disturbance by local traffic - 1

An open area of grass and trees. Vehicles constantly disrupting tranquillity.

D8. Denman Drive, Ashford

A 0.15ha plot of grass. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D9. Chessholme Road, Ashford

A 0.09ha plot of grass, with some trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D10. Norman Road, Ashford

A 0.09ha plot of grass, with some trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D11. Tudor Road, Ashford

A 0.07ha plot of grass, with some trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D12. Nell Gwynne Avenue/Caesers Way, Shepperton

Beauty: An undulating patch of grass with a line of trees bordering a road, very limited visual attractiveness - 1

Historic Significance: None - 0

Recreation Value: Public access with a children's play area - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Limited screening, but disturbance from roads nearby - 2

D13. Catlin Crescent, Shepperton

A 0.13ha plot of grass, with some mature trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D14. Lime Crescent, Sunbury

A 0.15ha plot of grass, with some mature trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D15. Catherine Drive, Sunbury

A 0.19ha plot of grass, with some mature trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D16. Heathcroft Avenue, Sunbury

A 0.13ha plot of grass, with some mature trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D17. Feltham Hill Road/Woodlands Parade, Ashford

A 0.23ha plot of grass, with some mature trees, separating local shops and car parking from Feltham Hill Road. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

D18. Elgin Avenue, Ashford

A 0.13ha plot of grass, with some mature trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

Other Land

E1. Horton Road/Hithermoor Road, Stanwell Moor

Beauty: Overgrown and abandoned patch of grass with some trees - 1

Historic Significance: None - 0

Recreation Value: No public access - 0

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Site is contained at the junction of village roads and close to Heathrow, with frequent disturbance - 2

E2. Jordans Close/Town Lane, Stanwell

A 0.15ha plot of grass, with some mature trees. Site is less than 0.25ha, therefore too small to be assessed for Local Green Space protections.

E3 Duncroft, Wraysbury Road, Staines

Not visited.

E4. Adjacent River Colne, Church Street, Staines

Beauty: Variety of natural features including parts of the River Colne flowing around islets accessible by bridges - 3

Historic Significance: Inside Staines conservation area – 1 (assuming that the site will be considered as making “a positive contribution to the setting” of the conservation area, otherwise - 0)

Recreation Value: Access is limited to patrons of a local restaurant - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Constant disturbance by traffic on Church Street and the Two Rivers Car Park - 1

E5. Knowle Green

Beauty: A grassed field surrounded by hedgerows, limited variety of natural features - 1

Historic Significance: None - 0

Recreation Value: Public access but with negligible recreation facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Although screened from the local road, the site is subject to frequent disturbance – 2

E6. Allotments, Staines Park

Beauty: A variety of natural features - 2

Historic Significance: None - 0

Recreation Value: Access to allotment holders only - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Site is contained, but not screened from frequent disturbance from traffic along Commercial Road - 2

E7. R/O Riverbank Flats, Laleham Road

Beauty: Excellent variety of natural features, mature trees, hedgerows, pond with mature reed bed - 5

Historic Significance: None - 0

Recreation Value: Garden is accessible by residents only - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Well screened and well away from traffic on Laleham Road and screened from the River Thames, no notable sources of disturbance - 5

E8. Penton Hall Drive, Laleham

Beauty: Good variety of natural features - 3

Historic Significance: None - 0

Recreation Value: Garden is accessible by residents only - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Well screened and well away from any source of disturbance - 5

E9. Penton Hook Road

Beauty: Very good variety of natural features - 4

Historic Significance: None - 0

Recreation Value: Garden is accessible by residents only - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Well screened from any vehicles using the end of Penton Hook Road and screened from the River Thames, no notable sources of disturbance - 5

E10. R/O Brookside Avenue, Ashford

Beauty: Overgrown plot of land, not visually attractive but a possible haven for wildlife - 1

Historic Significance: None - 0

Recreation Value: Not accessible to public, access route has been fenced off - 0

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Constant disturbance from traffic on the A308 - 1

E11. Grounds of Sunbury Court, Sunbury

Beauty: Limited variety of natural features - 2

Historic Significance: None - 0

Recreation Value: Salvation Army Conference Centre - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Site is screened from local traffic and large enough to get away from disturbance - 4

E12. Flower Pot Green, Thames Street, Sunbury

Beauty: Limited variety of natural features - 2

Historic Significance: Inside Lower Sunbury conservation area - 1 (assuming that the site will be considered as making "a positive contribution to the setting" of the conservation area, otherwise - 0)

Recreation Value: Public access but with negligible recreation facilities except park benches - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Frequent disturbance although screened from traffic on Thames Street - 2

E13. Cemetery, Church Road, Shepperton

Beauty: Good variety of mature natural features - 3

Historic Significance: Inside Shepperton conservation area - 1 (assuming that the site will be considered as making "a positive contribution to the setting" of the conservation area, otherwise - 0)

Recreation Value: Public access but with negligible recreation facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Despite screening there is constant low background noise of traffic on M3 - 4

E14. Allotments, Grove Road, Shepperton

Beauty: A variety of natural features - 2

Historic Significance: None - 0

Recreation Value: Access to allotment holders only - 1

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Site is contained and tucked away in a residential area - 4

E15. Gordon Road/Russell Road, Shepperton

Beauty: A triangle strip of grass with a few trees - 1

Historic Significance: None - 0

Recreation Value: Public access to negligible recreation facilities - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Constant disturbance from traffic in spite of the hedge on the Russell Road (B375) side of the plot - 1

E16. Staines Res. Aqueduct (Shortwood Common to Ashford Road)

Beauty: A strip of grass either side of the concrete aqueduct with sparse vegetation along the fence - 1

Historic Significance: None - 0

Recreation Value: No public access - 0

Wildlife: no evidence available of observed wildlife (limited habitat) - 1

Tranquillity: Frequent disturbance from neighbouring main roads with limited screening - 2

E17. Staines Res. Aqueduct (Ashford Road to Spelthorne Lane)

Beauty: A strip of grass either side of the concrete aqueduct with sparse vegetation along the fence - 1

Historic Significance: None - 0

Recreation Value: No public access - 0

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Frequent disturbance from neighbouring main roads with limited screening - 2

E18. Staines Res. Aqueduct (West of Windmill Road)

Beauty: A strip of grass either side of the concrete aqueduct with sparse vegetation along the fence - 1

Historic Significance: None - 0

Recreation Value: No public access - 0

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Frequent disturbance from neighbouring main roads with limited screening - 2

E19. Staines Res. Aqueduct (Windmill Road to M3)

Beauty: A strip of grass either side of the concrete aqueduct with sparse vegetation along the fence - 1

Historic Significance: None - 0

Recreation Value: No public access - 0

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Frequent disturbance from neighbouring main roads with limited screening - 2

E20. St Matthews Church, Ashford

The church is a nationally listed building, but at only 0.24ha the site is too small to be assessed for Local Green Space protections.

E21. Land at Sunbury Cross between M3 and railway

Beauty: Limited variety of natural features surrounding the skateboard park - 1

Historic Significance: None - 0

Recreation Value: Public access to the skateboard park - 2

Wildlife: No evidence available of observed wildlife - 1

Tranquillity: Constant disturbance from traffic on the M3 motorway - 1

Summary

The table below summaries by criterion the number of sites that scored between 0 and 5 points. For example, only one site scored 5 points for Beauty, and twenty-two sites scored 2 points for Recreational Value.

Criterion	0	1	2	3	4	5
Beauty	16	40	9	4	1	1
Historic Significance	64	7	0	0	0	0
Recreational Value	23	21	22	5	0	0
Richness of Wildlife	16	55	0	0	0	0
Tranquillity	16	12	28	5	7	3

Moreover, the total median score was 5, which was achieved by twenty sites, and the mean average was 4.88 points. The highest score was 12 which only one site achieved, and sixteen sites did not achieve any points, fourteen of which were disqualified by size.

APPENDIX 2 – Scoring of current list of Public Urban Open Spaces

Council-owned Parks and Recreation Grounds									
A1	Alexandra Road	Ashford	1	0	2	1	2	6	
A2	Ashford Recreation Ground, Clockhouse Lane	Ashford	1	1	3	1	3	9	Clock tower is locally listed 
A3	Cedars Recreation Ground, Green Street	Sunbury	2	1	3	1	2	9	War Memorial is locally listed. 

A4	Feltham Hill Road	Ashford	1	0	2	1	2	6	
A5	Groveley Road	Sunbury	1	0	2	1	2	6	
A6	Lauser Road (eastern end)	Stanwell	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.09ha) 
A7	Scott Freeman Gardens, Church Road	Ashford	1	0	2	1	1	5	

A8	Staines Park, Knowle Green	Staines	1	0	3	1	3	8	
A9	Stanwell Recreation Ground, Oaks Road	Stanwell	2	0	3	1	3	9	
A10	Village Park, Hadfield Road	Stanwell	1	0	2	1	3	7	
A11	Memorial Gardens	Staines	3	1	2	1	3	10	<p>Inside Staines Conservation Area. Adjacent to the River Thames, SSSI</p> 

A12	Spelthorne Grove	Sunbury	1	0	3	1	1	6	
A13	Holywell Way	Stanwell	1	0	2	1	2	6	This is now a housing development. 
A14	Studios Road	Shepperton	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.19ha) 
A15	Glebelands Gardens	Shepperton	1	0	2	1	4	8	

A16	Former line of Lower Sunbury Relief Road (TP26)	Sunbury	2	0	2	1	4	9	
Private Sports Grounds									
B1	Ashford Sports Club, Woodthorpe Road	Ashford	1	0	1	1	4	7	This is now a housing development - The Wickets. Recreational value is limited to a children's playground in the SW corner, only accessible from inside The Wickets, not from Chesterfield Road. 
B2	Lazards Sports Club, The Avenue	Sunbury	1	0	1	1	2	5	Not inspected - Private sports clubs
B3	Gaflac Sports Club + London Irish RFC, The Avenue	Sunbury	1	0	1	1	2	5	Not inspected - Private sports clubs
B4	Elmsway Tennis Club, Elmsway, Ashford School Grounds	Ashford	1	0	1	1	4	7	Could have scored a 5 for Tranquility, but for the aircraft noise. 

School Grounds									
C1	Town Farm School	Stanwell	1	0	1	1	2	5	School playing field - expanse of grass.
C2	Echelforde School, Park Road	Ashford	1	0	1	1	2	5	Not inspected - School property
C3	R/O Spelthorne College, Church Road	Ashford	0	0	0	0	0	0	Not very well protected. New housing development is being built on the site.
C4	Staines Prep School, Gresham Road	Staines	1	1	1	1	2	6	School building is locally listed. 
C5	R/O Our Lady RC School and Kingscroft Junior School, Park Ave	Staines	1	0	1	1	2	5	School playing field - expanse of grass.
C6	Matthew Arnold School	Staines	1	0	1	1	2	5	Not inspected - School property
C7	Sunbury Manor School, Nursery Road	Sunbury	1	0	1	1	2	5	Not inspected - School property
C8	St Nicholas School	Shepperton	1	0	1	1	2	5	Approximately 100m from Ash Link Nature Reserve and separated by a path. School has an area of grass with some trees. 
C9	St Paul's School and St Teresa's Convent	Sunbury	1	0	1	1	2	5	Not inspected - School property
C10	Thamesmead School	Shepperton	1	0	1	1	2	5	Not inspected - School property
C11	Halliford School	Shepperton	1	0	1	1	2	5	Not inspected - School property
C12	Springfield CF and Middle School	Sunbury	1	0	1	1	2	5	Not inspected - School property

Open Land within Residential Estates									
D1	Hadrian Way/Canopus Way	Stanwell	1	0	2	1	1	5	<p>This is an open area housing estate with some trees and grass areas - an urban open space.</p> 
D2	The Royal Estate (Edinburgh Drive/Elizabeth Avenue)	Staines	1	0	2	1	1	5	<p>This is an open area housing estate with some trees and grass areas - an urban open space.</p>
D3	Beechwood Avenue/Ashridge Way	Sunbury	1	0	2	1	1	5	<p>This is an open area housing estate with some trees and grass areas - an urban open space.</p>
D4	Belgrave Road/Batavia Road	Sunbury	1	0	2	1	1	5	
D5	Preston Road/Greeno Crescent	Shepperton	1	0	2	1	1	5	<p>Several small areas of open space scattered through the estate.</p>
D6	Selwood Gardens	Stanwell	2	0	2	1	2	7	<p>Although within 100m of Staines Reservoir site does not display any significant richness of wildlife</p> 

D7	Strodes Crescent	Staines	2	0	2	1	1	6	
D8	Denman Drive	Ashford	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.15ha)
D9	Chesholme Road	Ashford	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.09ha)
									
D10	Norman Road	Ashford	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.09ha)
									
D11	Tudor Road	Ashford	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.07ha)
									

D12	Nell Gwynne Avenue/Caesers Way	Shepperton	1	0	2	1	2	6	
D13	Catlin Crescent	Shepperton	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.13ha) 
D14	Lime Crescent	Sunbury	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.15ha) 
D15	Catherine Drive	Sunbury	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.19ha) 

D16	Heathcroft Avenue	Sunbury	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.13ha)	
D17	Feltham Hill Road/Woodlands Parade	Ashford	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.23ha)	
D18	Elgin Avenue	Ashford	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.13ha)	
Other Land										
E1	Horton Road/Hithermoor Road	Stanwell Moor	1	0	0	1	2	4		

E2	Jordans Close/Town Lane	Stanwell	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.15ha)
									
E3	Duncroft, Wraysbury Road	Staines		0				0	
E4	Adjacent River Colne, Church Street	Staines	3	1	1	1	1	7	Inside Staines Conservation Area
									
E5	Knowle Green	Staines	1	0	2	1	2	6	
									
E6	Allotments, Staines Park	Staines	2	0	1	1	2	6	Protected by a covenant.
									

E7	R/O Riverbank Flats, Laleham Road	Staines	5	0	1	1	5	12	Adjoins a SSSI - The Thames 
E8	Penton Hall Drive	Staines	3	0	1	1	5	10	Adjoins a SSSI - The Thames 
E9	Penton Hook Road	Staines	4	0	1	1	5	11	Adjoins a SSSI - The Thames 
E10	R/O Brookside Avenue	Ashford	1	0	0	1	1	3	Land is inaccessible and enclosed by houses, gardens, and the A308 Staines By-pass. 

E11	Grounds of Sunbury Court	Sunbury	2	0	0	1	4	7	Salvation Army Conference Centre
E12	Flower Pot Green, Thames Street	Sunbury	2	1	2	1	2	8	Inside Lower Sunbury Conservation Area and adjoins an SSSI (The Thames)
E13	Cemetery, Church Road	Shepperton	3	1	2	1	4	11	Inside Shepperton Conservation Area. M3 constantly audible.
E14	Allotments, Grove Road	Shepperton	2	0	1	1	4	8	



E15	Gordon Road/Russell Road	Shepperton	1	0	2	1	1	5	
E16	Staines Reservoir Aquaduct (Shortwood Common to Ashford Road)		1	0	0	1	2	4	
E17	Staines Reservoir Aquaduct (Ashford Road to Spelthorne Lane)		1	0	0	1	2	4	
E18	Staines Reservoir Aquaduct (West of Windmill Road)		1	0	0	1	2	4	
E19	Staines Reservoir Aquaduct (Windmill Road to M3)		1	0	0	1	2	4	
E20	St Matthews Church	Ashford	N/A	N/A	N/A	N/A	N/A	0	Not protected below 0.25ha threshold (0.24ha). Nationally listed building. 
E21	Land at Sunbury Cross between M3 and railway	Sunbury	1	0	2	1	1	5	

APPENDIX 3 – Emails: Keith Tothill / Spelthorne Borough Council

From: ??????????@spelthorne.gov.uk>
Sent: 20 May 2019 11:26
To: 'Keith Tothill'
Subject: RE: Local greenspace assessment methodology

Keith,

As you rightly state the Churchyard is owned by CoE

Studios Road, Lime Crescent, Lauser Road, Norman Road and Tudor Road are all owned by Spelthorne BC.

The remaining sites – ownership is not clear however they are not listed as being SBC assets so in all likelihood they fall within private ownership.

Regards,
???????????

From: Keith Tothill
Sent: 20 May 2019 11:01
To: ??????????@spelthorne.gov.uk>
Subject: Re: Local greenspace assessment methodology

Dear ????????????

Many thanks for such a quick reply. Because I am not familiar with the area.

Could you please tell me of these 14 small sites which ones are:

(i) privately owned -obvioulsy the first one you list St Mathews Chuchyard is within this category!

(ii) which ones are publicly owned (open sites included in residential areas).

Thank you
Keith Tothill

From: ??????????>
Sent: 20 May 2019 09:42
To: 'Keith Tothill'
Subject: RE: Local greenspace assessment methodology

Dear Mr Tothill,

Thank you for your e-mail.

The sites that are covered by the Protected Urban Open Space (PUOS) designation on the proposals map that meet the criteria of being either over 10 hectares or under 0.25 hectares are as follows:

Name of Space	Size (ha)	Ref on proposals map
St Matthews Churchyard, Ashford	0.24	E20
Feltham Hill Road/ Woodlands Parade	0.23	D17
Studios Road, Shepperton	0.19	A14
Catherine Drive, Sunbury	0.19	D15
Denman Drive, Ashford	0.15	D8
Jordans Close/Town Lane, Stanwell	0.15	E2
Lime Crescent, Sunbury	0.15	D14
Caitlin Crescent Green, Shepperton	0.13	D13
Elgin Avenue, Ashford	0.13	D18
Heathcroft Avenue, Sunbury	0.13	D16
Chessholme Road	0.09	D9
Lauser Road (eastern end), Stanwell	0.09	A6
Norman Road	0.09	D10
Tudor Road, Ashford	0.07	D11

There are no sites covered by the PUOS designation which exceed 10 ha in size.

I hope the above is of use and please do not hesitate to contact me should you need any further information.

Kind Regards,