



# Open Spaces Study Stage 2

**ON BEHALF OF CROYDON COUNCIL**

February 2024

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# 1. Introduction

## Overview

- 1.1 Stage 2 of the 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. Stage 2 of the Study provides a comprehensive review of the 12 additional sites that were identified in Stage 1 as being worthy of further consideration for inclusion within the list of Local Green Sites recommended for designation.
- 1.3 The Study has been prepared to reflect the requirements for planning policy soundness for Local Green Space (LGS) designation which are set out in the latest iterations of the National Planning Policy Framework (the 'NPPF') (published December 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 meets the stringent requirements of national policy for the purposes of the publication and examination of this Part 2 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 to provide special protection against development for green areas of particular importance to local communities. 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.
- 1.7 For completeness, an overview of the process taken to establish the Local Green Spaces has been provided at **Appendix B** of this report.
- 1.8 This report has been prepared as an addendum to, and should be read in conjunction with, the Stage 1 report, dated December 2023.

## Structure of the Study

1.9 This report is structured as follows:

- Section 2 provides a summary of the current planning policy relevant to the Study.
- Section 3 refers to individual appraisals of the 12 additional locations identified as candidates for 'Local Green Space' designation, and addresses these against the 20 sites analysed in Stage 1 as well as the other sites identified as 'Important Green Spaces' in the Council's assessment.
- Section 4 sets out our overall recommendations.

## 2. Current Policy

- 2.1 'Local Green Space' designation is discussed under the NPPF (2023) and the Planning Practice Guidance (Open space, Sports and Recreation Facilities). Broadly, it is directed that every Local Green Space satisfies the criteria set out under NPPF Paragraph 106, relating to 'proximity', 'significance' and 'local in character'. As set out in paragraphs 105-107 and footnote 7 of the NPPF, the LGS designation provides the same level of protection as Green Belt to areas of green space that are particularly valued by their local communities. Further to this, the London Plan provides that Development Plans should include appropriate designations and policies for the protection of open space.
- 2.2 The Croydon Local Plan (Adopted, 2018) does not currently identify any LGS. However, it is intended that sites will be designated as LGS as part of the Croydon Local Plan Review currently underway. The LGS designations will be guided by both Stage 1 and Stage 2 of this comprehensive Open Spaces Study.
- 2.3 Planning policy addressing LGS is discussed in more detail within Stage 1 of the Open Spaces Study.

### Defining Local Green Space

- 2.4 Local Green Space is not specifically defined in any recognised planning policy statement, 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.*

- 2.5 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. 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.

## 3. Assessment

### Introduction

- 3.1 Nexus has been asked to consider a total of 102 sites under the Council's current consideration of Green Spaces. This comprised 20 'front runner' sites which were assessed under Stage 1 of the Open Spaces Study, which the Council considered to be strong contenders for designation as LGS. It was determined that 18 of the 20 sites assessed under Stage 1 should be carried forward to proposed designation as LGS. Stage 1 of the Study also identified an additional 12 sites from Council's list of 'Important Green Spaces' which we believe are worthy of further consideration for inclusion within the list of LGS recommended for designation. In reviewing the appropriateness of additional sites for further consideration, we examined the data collated by YellowSubmarine.io which measured the cumulative monthly footfall and dwell time of each candidate site, coupled with the site descriptors at Appendix B of Stage 1. The list of additional sites chosen for further review excludes any sites that have a footfall count ranked within the bottom third of the 84 assessed, as well as any sites with a dwell time of 15 minutes or less.
- 3.2 Stage 2 of the Open Spaces Study provides a detailed review of the additional 12 sites that were identified in Stage 1, to determine whether any of these sites should also be considered for Local Green Space designation. The 12 sites have been considered against the three key criteria set out at Paragraph 106 of the NPPF to determine whether they have all the characteristics necessary to robustly put them forward for designation, in addition to those already identified in Stage 1.

### Methodology

- 3.3 The Stage 2 investigation has involved a desktop review of information available from online sources, along with an element of quantitative evidence, namely mobile phone location data which allows us to accurately understand footfall and dwell-time across the various candidate sites. We note that unlike the 'front runner' shortlist of 20 sites identified by the Council, the Stage 2 additional sites have not been subject to the same level of community consultation and therefore additional qualitative views of the community were not available for assessment.
- 3.4 As detailed further in Figure 3-1, we have utilised a wide range of empirical data including the following two key data providers:
- 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.
- 3.5 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 below.

Figure 3-1 Reporting Categories

Category	Criteria	Source
Preliminary Information	<ol style="list-style-type: none"> <li>1) Name and address of site</li> <li>2) Aerial Map</li> <li>3) Council Description</li> <li>4) Local Plan Designations</li> </ol>	<ol style="list-style-type: none"> <li>1) Google.com</li> <li>2) Google Maps</li> <li>3) Croydon Council website</li> <li>4) Croydon Local Plan 2018, Proposals Map</li> </ol>
NPPF Test 1: Proximity to the Community it Serves	<ol style="list-style-type: none"> <li>1) Population within 1km (2023)</li> <li>2) Footfall per Day (October 2022)</li> <li>3) Average Dwell-time (October 2022)</li> <li>4) Age Profile within 1km (2023)</li> <li>5) Residential Tenure within 1km (2023)</li> <li>6) PTAL Rating</li> </ol>	<ol style="list-style-type: none"> <li>1) Experian AppLibrary</li> <li>2) YellowSubmarine.io</li> <li>3) YellowSubmarine.io</li> <li>4) Experian AppLibrary</li> <li>5) Experian AppLibrary</li> <li>6) Transport for London website, WebCAT tool</li> </ol>
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	<ol style="list-style-type: none"> <li>1) DEFRA Classification</li> <li>2) Historic Significance</li> <li>3) Community Importance</li> <li>4) Sports Facilities</li> <li>5) Tranquillity</li> </ol>	<ol style="list-style-type: none"> <li>1) DEFRA website + Magic Map website</li> <li>2) Historic England + Nexus research</li> <li>3) Nexus research</li> <li>4) Nexus research</li> <li>5) Nexus research</li> </ol>
NPPF Test 3: Local in Character and not an extensive tract of land	<ol style="list-style-type: none"> <li>1) Local Character</li> </ol>	<ol style="list-style-type: none"> <li>1) Nexus research</li> </ol>

- 3.6 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.
- 3.7 Our additional 12 site appraisals for the Local Green Space candidate sites are included at **Appendix A**.
- 3.8 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. Parkfields Recreation Ground	Medium	Medium	High	Medium
2. Pollards Hill Triangle	Medium	Medium	High	Medium
3. College Green	High	Low	Low	Low
4. Westow Park	High	High	High	High
5. Whitehorse Road Recreation Ground	High	High	High	High
6. Trumble Gardens	Medium	Medium	High	Medium
7. Haling Grove	High	High	High	High
8. South Norwood Recreation Ground	High	High	High	High
9. The Queen's Gardens	High	Medium	High	High
10. South Croydon Recreation Ground	Medium	High	High	High
11. Ashburton Park	Medium	High	High	High
12. Grangewood Park	Medium	High	High	High

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

3.10 YellowSubmarine.io has also ranked 84<sup>1</sup> of the 102 candidate sites to understand their footfall and dwell-time characteristics. We set these rankings out in Stage 1 of the Study, and also provide them below for reference.

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

<sup>1</sup> No Google geofencing data exists for 19 of the sites.



Site	Footfall	Dwell time (minutes)
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
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

Site	Footfall	Dwell time (minutes)
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 Wood	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
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

## 4. Recommendations

### Local Green Space Candidate Sites

- 4.1 The Stage 2 Study has considered a further 12 sites in addition to those put forward by the Council (Stage 1) 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 8 of those sites have an overall rating of ‘high’ against the various metrics we have considered, whilst 3 of the sites rank as ‘medium’, and 1 ranks as ‘low’.
- 4.3 Our overall assessment is therefore that 8 of the 12 additional sites which score ‘high’ against the NPPF criteria should be carried forward to proposed designation as Local Green Spaces. These sites are listed in Figure 4-1.

Figure 4-1 Recommended Sites for Local Green Space Designation

Site	Overall
4. Westow Park	High
5. Whitehorse Road Recreation Ground	High
7. Haling Grove	High
8. South Norwood Recreation Ground	High
9. Queen’s Gardens	High
10. South Croydon Recreation Ground	High
11. Ashburton Park	High
12. Grangewood Park	High

- 4.4 We have ranked the following 4 sites as ‘low’ or ‘medium’. Unlike the 20 key sites considered under Stage 1 of the Open Spaces Study, the additional 12 sites assessed under Stage 2 were not subject to the same level of community consultation at the outset for the purpose of gathering evidence on how demonstrably special the spaces are to the community. As such, we suggest the Council either considers not including the ‘low’ and ‘medium’ ranked sites in the List for Designation at this time, 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
1. Parkfields Recreation Ground	Medium
2. Pollards Hill Triangle	Medium
3. College Green	Low
6. Trumble Gardens	Medium

4.5 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 Spaces

4.7 We previously ranked footfall and dwell time at Figure 3-3. In Figures 4-3 and 4-4 below, the ranked footfall and dwell time are represented in graph format, with the Stage 1 'front runner' sites shown in light blue and the Stage 2 additional sites shown in dark blue alongside the other sites. These graphs demonstrate that the additional sites chosen for further review exclude any sites that have a footfall count ranked within the bottom third of the 84 assessed, as well as any sites with a dwell time of 15 minutes or less.

Figure 4-3 Ranked Footfall Data (Monthly cumulative footfall, October 2023)

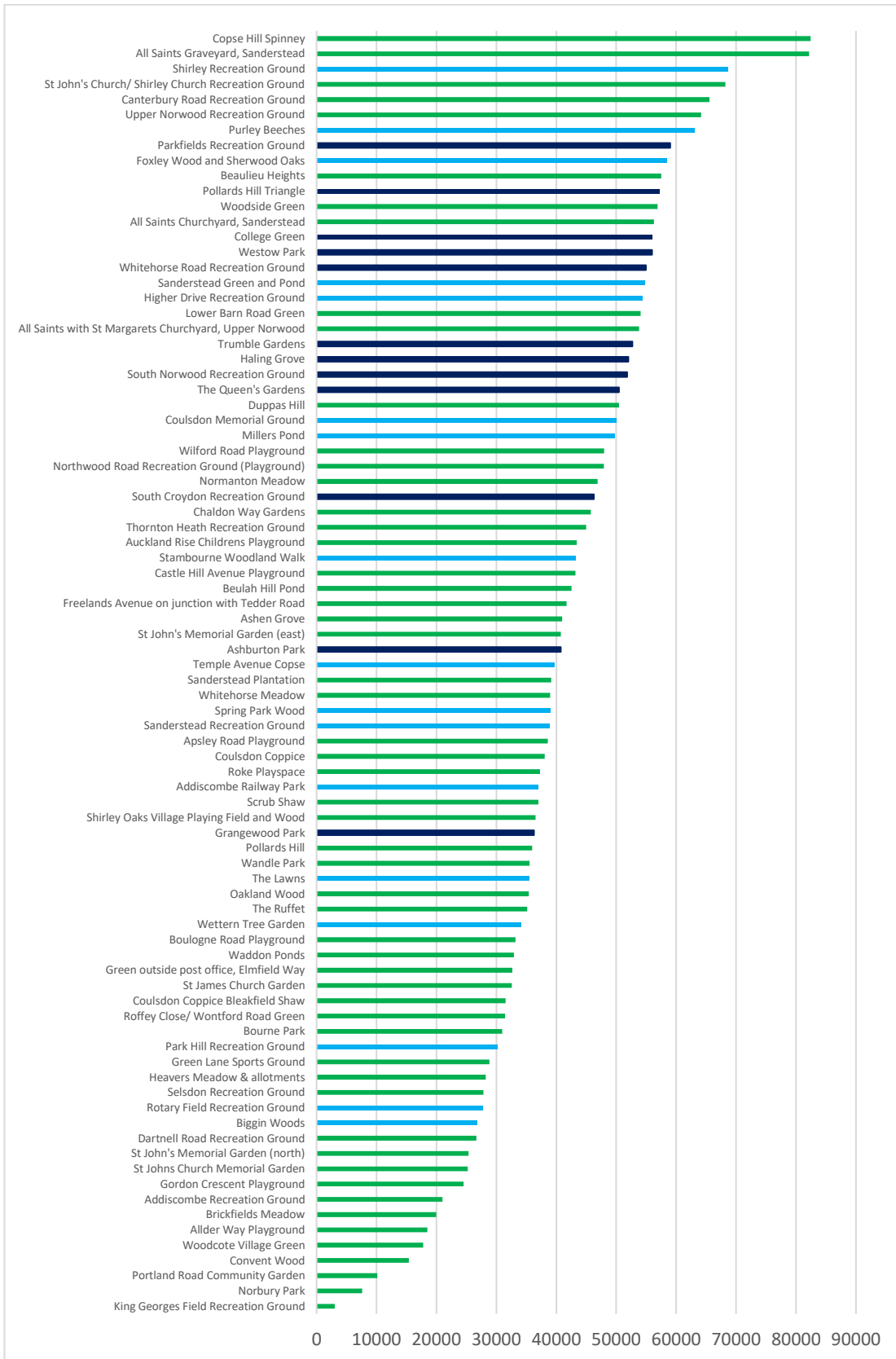
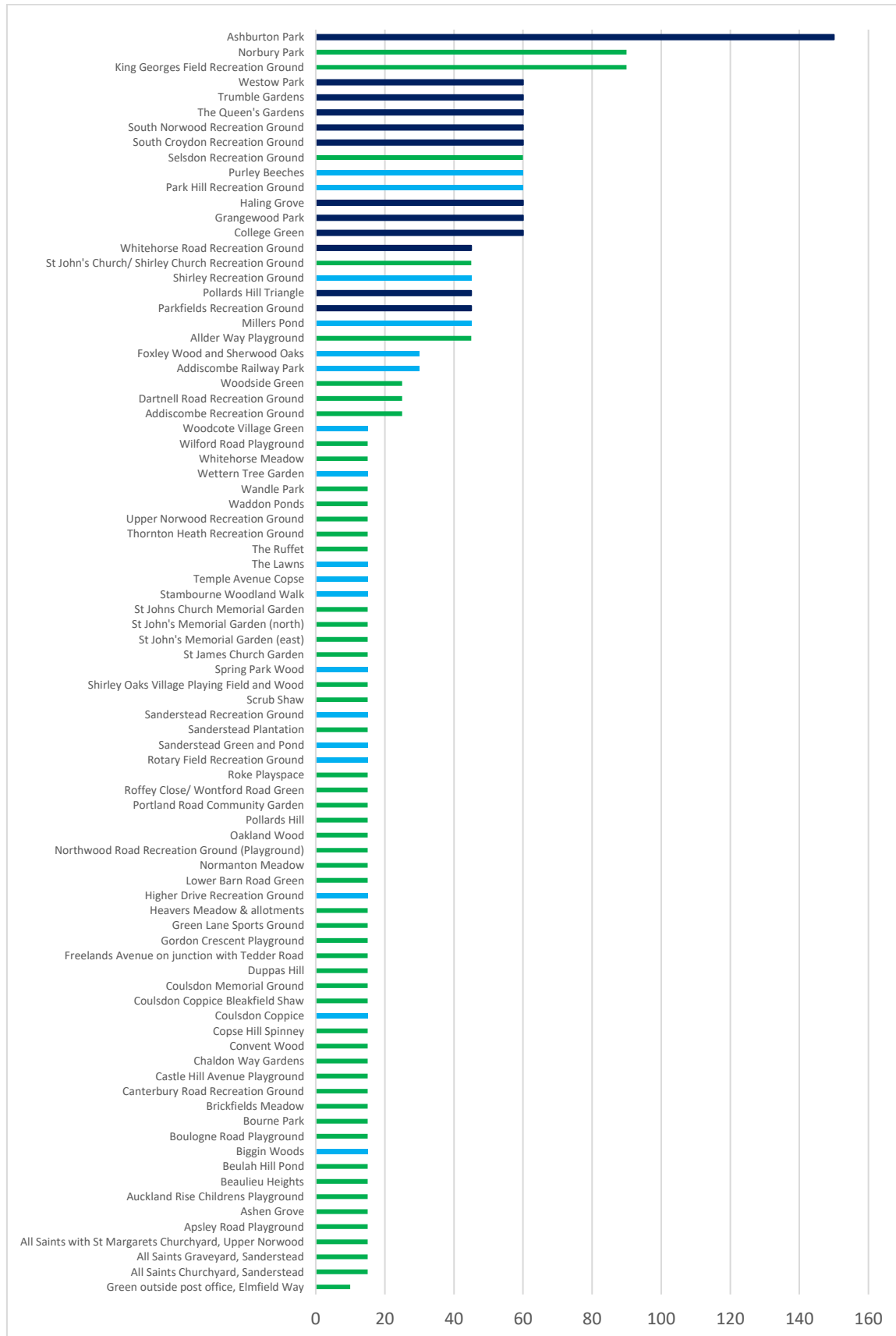


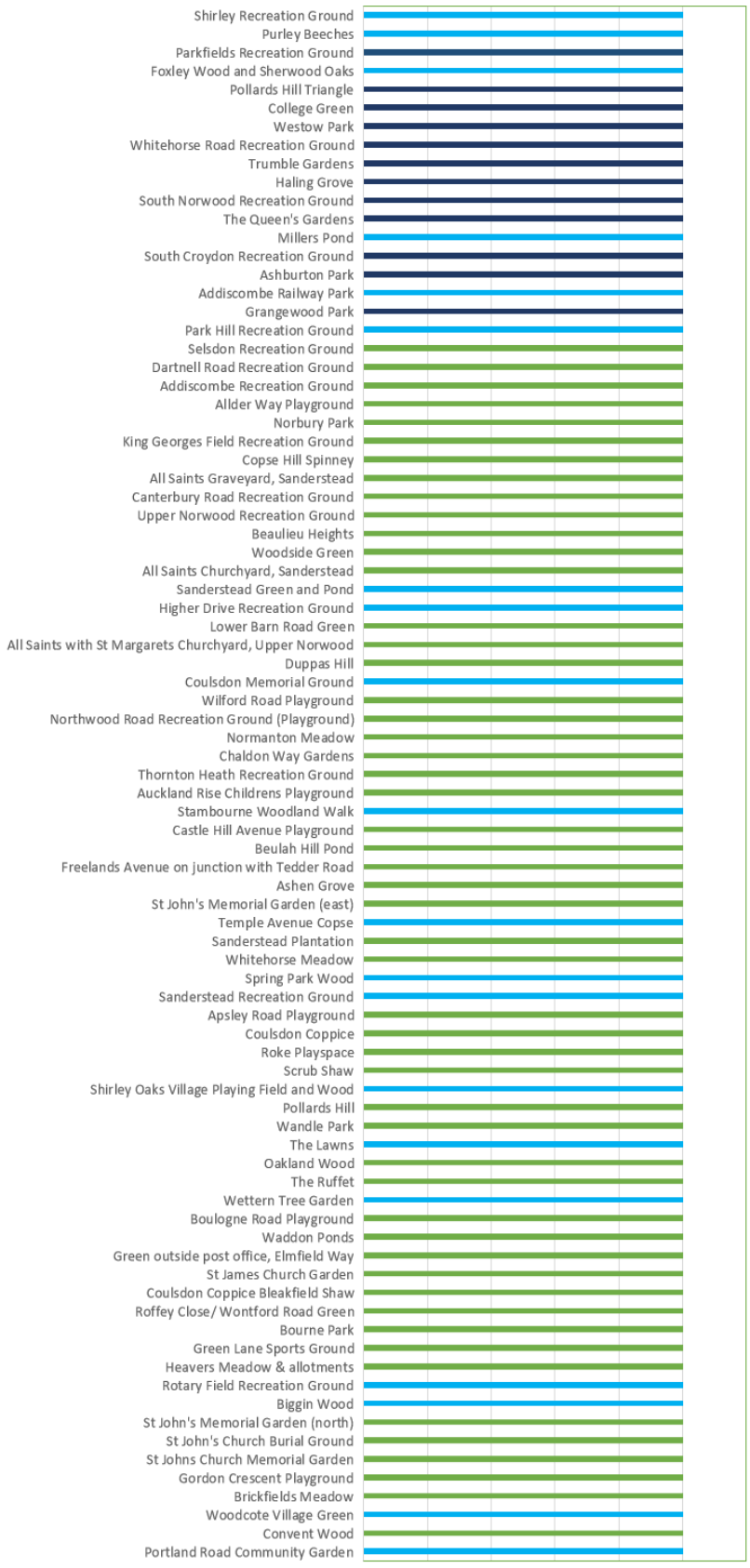
Figure 4-4 Ranked Dwell-time Data (Monthly average Dwell-time, October 2023)



## 5. Overall Ranking of Green Spaces

- 5.1 This section sets out the overall ranking of green spaces, taking into account the data collected by YellowSubmarine.io on both footfall and dwell-time for each of the 84 sites.
- 5.2 The top listed sites that were not included in the Stage 1 review were selected for additional review, which formed the basis for the Stage 2 Open Spaces Study. Any sites with a footfall count within the bottom third of the 84 assessed, and any sites with a dwell time of 15 minutes or less were not recommended for further review. In addition, consideration was also given to the site context as summarised at Appendix B of the Stage 1 report.
- 5.3 The graph at Figure 5-1 shows the ranking of all 84 sites, including the 20 sites analysed in Stage 1 and the additional 12 sites analysed in Stage 2. The 20 sites analysed in Stage 1 are shown in light blue, and the additional 12 sites analysed in Stage 2 are shown in dark blue.

Figure 5-1 Overall Ranking of Green Spaces (Monthly average Dwell-time and Footfall, October 2023)





## 6. Bibliography

1. *National Planning Policy Framework* ([www.gov.uk](http://www.gov.uk))
2. *PPG - Open space, sports and recreation facilities, public rights of way and local green space* ([www.gov.uk](http://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](http://cpre.org.uk))
5. *Historic England - Championing England's heritage | Historic England*
6. *Croydon Council Local Green Space - Technical Note 2019* ([croydon.gov.uk](http://croydon.gov.uk))

## **Appendix A – Local Green Space Candidate Site Appraisals**

## **Appendix B – Local Green Space Journey**

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