
Local Green Space Study Addendum

Elmbridge Local Plan



June 2023



Elmbridge
Borough Council
... bridging the communities ...

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1.0 Introduction

- 1.1 Through the process of the emerging Elmbridge Local Plan at key consultations, the council asked its communities and other stakeholders whether it should continue to give a high level of protection to all open spaces and designate those spaces which meet the criteria as Local Green Spaces.
- 1.2 The Local Green Space Study (April 2022) provided the methodology and the evidence for the proposed designation of 51 areas of Local Green Space in the publication of the Regulation 19 Elmbridge Local Plan. These sites were identified on the policies map and listed in Appendix 4 of the emerging Local Plan.
- 1.3 The regulation 19 representation stage took place from 17 June to 29 July 2022 and allowed interested parties to comment on the [Draft Elmbridge Local Plan 2037 and supporting information](#). The council asked for representations on legal compliance and the four tests of soundness¹. The draft Local Plan included policy ENV3: Local Green Spaces and the [Local Green Space Designation Study 2022](#) provided the evidence which set out the methodology for the assessing sites for proposed Local Green Space designation.
- 1.4 This addendum report considers the representations received on policy ENV3 and the proposed 51 Local Green Space sites. In total 13 representations were received:
- 7 respondents considered the policy legally compliant and sound.
 - 2 respondents suggested new sites to be considered for designation.
 - 1 respondent wanted 4 previously discounted sites to be reassessed.
 - 2 disagreed with a designation
 - 1 commented that 2 sites and additional land should be assessed together as one larger site.
- 1.5 In total, 4 sites that have not previously been assessed for Local Green Space were presented for assessment. 4 sites were asked to be reassessed including a joint assessment. 2 sites were considered not to meet the criteria for Local Green space and 1 site should be enlarged. Please see table below for the breakdown of sites suggested.

¹ Whether the Plan is positively prepared, justified, effective and consistent with national policy (NPPF, para 35).

Table 1: Table of sites assessed in this addendum report

Site address	New site suggested	Re-assessment of sites not designated	Disagree with designation	Disagree with site size
Stoke D'Abernon Memorial Park, Station Road, Stoke D'Abernon	√			
Thames Street Green Space, Weybridge	√			
Grotto Road Recreation Area, Weybridge	√			
Walton Lane Open space, Weybridge	√			
Fieldsave, Summer Road, Thames Ditton (92)		√		
Kingston Grammar School Playing Fields/ Ditton Field, Thames Ditton (103)		√		
Land at Esher College, Thames Ditton (104)		√		
Ditton Marina, Portsmouth Road, Thames Ditton (88)		√		
51. One Tree Hill, Hinchley Wood and 8. Stokes Field and surrounding community uses.				√
30. Wooded Area in Burwood Park Area D			√	
6. Moore Place Golf Club, Esher			√	

1.6 The purpose of this addendum is to formally consider these representations and either reassess or provide new assessments for the suggested sites in preparation for submitting the draft Local Plan to the Inspectorate for examination.

This addendum must be read alongside the [Local Green Space Designation Study 2022](#) as it does not repeat the methodology for assessing sites.

2.0 Assessment

2.1 This section of the addendum looks at the sites put forward in the representations on the Regulation 19 period of the Local Plan, that have been considered further or reassessed and discusses the results of the site visits and assessment.

Additional sites suggested

2.2 Stoke D'Abernon Residents Association suggested the following site for inclusion in the draft Local Plan for Local Green space designation.

- **Stoke D'Abernon Memorial Park, Station Road, Stoke D'Abernon**

2.3 The association provided a map and a supporting statement (appendix 1) which set out the history of the site and why they considered it met the criteria set out in the [Local Green Space Designation Study 2022](#). It was considered by the association that the historical importance of the site and the popularity of the park as a play area means the site should be designated as Local Green Space.

2.4 Portmore Park and District Residents Association suggested the following sites located in Weybridge should be assessed for inclusion as Local Green Space in the Elmbridge Local Plan.

- **Thames Street Green Space, Weybridge**
- **Grotto Road Recreation Area, Weybridge**
- **Walton Lane Open space, Weybridge**

2.5 Supporting statements (at appendix 2) were provided for each of the sites above including map locations, photographs, and the justification for inclusion. The association set out in the documents why they believed each of these sites meet the criteria of Local Green Space.

Result

2.6 Site visits took place in December 2022 and proformas written to assess the site for Local Green Space designation against the criteria for designation. The proformas at appendix 6 set out in full the scores and justification.

2.7 To summarise the results, Thames Street Green space was assessed and did not score enough points to merit Local Green space designation. The site acts as a visual green break from the development which helps create visual

attractiveness in an otherwise urban area. However, the site does not have any historical significance or formal recreational value and only one notable habitat.

- 2.8 Grotto Road Recreation area scored well for tranquility and historic significance due to its location within the Oatlands Park of special historic interest but did not score enough points for beauty, recreational value and richness of wildlife.
- 2.9 Stoke D'Abernon Memorial Park is considered suitable for Local Green Space designation. The pocket park contributes to the general appearance of the built-up area and aids a visual break in built form at a prominent corner plot. The site scored well in terms of beauty, historical significance, recreational value, tranquility, and richness of wildlife.
- 2.10 Walton Lane Open space scored maximum points for richness of wildlife as it is located within the Thorpe and Shepperton biodiversity opportunity area. It also scored well for tranquility, recreational value, and beauty. This site has been considered suitable for Local Green Space designation.
- 2.11 Stoke D'Abernon Memorial Park and Walton Lane Open Space will be added to the Local Green Space designation list and policies map for submission of the Elmbridge Draft Local Plan.

Previous sites that did not meet the Local Space criteria to be reassessed

- 2.12 Thames Ditton and Weston Green Residents Association (TDWGRA) requested that the following sites should be reassessed and designated as Local Green Space.
- **Fieldsave, Summer Road, Thames Ditton (92)**
 - **Kingston Grammar School Playing Fields/ Ditton Field, Thames Ditton (103)**
- 2.13 The association stated in their representation that these sites should be considered together as they form one contiguous piece of land. They also provide the setting for Grade 1 listed Hampton Court Palace and form an important part of the protected strategic views from Hampton Court Palace to the Surrey Hills.
- 2.14 In addition to the above, TDWGRA also requested the following two sites should be reassessed for the following reasons:
- **Land at Esher College, Thames Ditton**
TDWGRA believe the site should not be treated differently to the Tiffins' Sports Grounds as are both are in close proximity to each other, and both lie

adjacent to the Hampton Court Way. The Esher College site has historic significance being part of what was the old Weston Manor Farm dating back to the Domesday Book.

- **Ditton Marina, Portsmouth Road, Thames Ditton**

TDWGRA disagree with the low assessment given in terms of recreational value, tranquility, and wildlife. There is public access to the various facilities on the site, which are widely used.

2.15 Site visits took place in December 2022 and all proformas have been reassessed. The proformas at appendix 7 set out the scores and justification.

Results

2.16 The site 'Fieldsave' scored a higher result due to an additional habitat identified on site, but this still did not meet the maximum score required to merit Local Green Space designation. It was suggested that this site is assessed with the neighbouring site, Kingston Grammar Sports Field (103), however the two sites are separate and have different uses. Both sites are not publicly accessible and Field Save was surrounded by wire fencing including a locked gate. However, a community group is using the green space to manage bumble bees within the woodland which increased the score for richness of wildlife.

2.17 Kingston Grammar Sports Field (103) has been reassessed following comments regarding its historical significance, which previously was scored 0. This has now changed as the site does form the setting for the Grade 1 Hampton Court Palace to the north. This results in this site being proposed for Local Greenspace designation.

2.18 Land at Esher College, Thames Ditton is self-contained, not publicly accessible and is used by the college. It is not visible from the roadside so does not contribute particularly to the wider townscape. It was considered by Thames Ditton and Weston Green Residents' Association that the site was similar to area 110 Old Tiffinians but this is quite different as area 110 contains allotments and is visible from the Hampton Court Way which contributes to the townscape. The assessment has been reviewed and the score remains.

2.19 Ditton Marina is a dock that stores boats for the use of boating activities. There is very little green space on site with only steep grass banks surrounding the marina/docks. The assessment has been reviewed and the original score remains.

Amendments suggested to designated Local Green Space sites

2.20 A representation was received that requested that supports the following designated sites but state,

In our view the appropriate area for designation as a Local Green Space would be a single site comprising areas 8 and 51 together with (a) the area between Stokes Field LNR and the field at One Tree Hill, and (b) the area of woodland, hedges and scrub immediately to the east of One Tree Hill and extending up to the boundary of the site currently in use by Hill Park Roses were made larger in size to incorporate neighbouring green spaces.

- **51. One Tree Hill, Hinchley Wood**
- **8. Stokes Field and surrounding community area**

Results

2.21 Joining up the two sites and enlarging the site to include surrounding green space, as described above, would exceed the 30ha threshold and therefore the site would then not meet the criteria to be considered for designation as Local Green Space. This would be to the detriment of both designated sites and therefore will not be increased.

LGS designation not supported.

2.22 One respondent stated that the following site should not be designated Local Green Space. It was not considered to be a benefit to the local community. The respondent believes that the site should be removed as there is no access to the community of Hersham.

- **30. Wooded Area in Burwood Park Area D**

Results

2.23 The site score remains the same as although not publicly accessible to the wider community of Hersham, it is accessible to those that live in Burwood Park and has met the criteria in terms of beauty, historic significance, tranquility, and richness of wildlife. Therefore, the site will continue to be proposed through the Local Plan for designation.

LGS designation not supported.

2.24 Nexus Planning on behalf of Charterhouse Strategic Land state that the site

below does not meet the criteria set out within either the PPG or NPPF and should be removed from the site as it is not sound.

- **6. Moore Place Golf Club, Esher**

2.25 Nexus Planning state that 'it has not been adequately evidenced or demonstrated that the site holds a particular local significance. No additional local benefit has been demonstrated by EBC to show what the site would gain by this designation over and above the protection afforded to it by the Green Belt'. The full response is available at Appendix 5.

Results

2.26 The council's approach and criteria for the designation of Local Green Space is set out in the Local Green Space Study 2023 and takes full account of the NPPF and PPG principles. The study explains what constitutes 'local in character' and an 'extensive tract of land'. It is considered that the site meets those requirements.

2.27 Although a former private golf club, the site is not self-contained. The quality and layout of mature trees extends all vista and viewpoints, which contributes to the setting of the settlement. A right of way footpath allows access to the site. The site forms the setting of 3 statutory Grade II listed building and therefore scores maximum points for historic significance. In total, the site scores 15 points which results in the proposed designation.

3.0 Conclusion

3.1 Further to the Regulation 19 representations received and following the assessment work, three additional sites will be added to the proposed Local Green Space designation list and policies map. These are:

- **Stoke D'Abernon Memorial Park, Station Road, Stoke D'Abernon**
- **Walton Lane Open space, Weybridge**
- **Kingston Grammar School Playing Fields/ Ditton Field, Thames Ditton**

3.2 The final assessments for each of the new sites can be found in the proformas in appendix 6. These sites will be proposed to be added as Local Green Space designations through the Local Plan process.

Appendix 1: Representation from Stoke D'Abernon Residents Association

**Stoke D'Abernon Memorial Park, Station Road, Stoke D'Abernon KT11 3BN
Request for this site to be given the designation of Local Green Space
Prepared by Ian Nelson, Chair – Stoke D'Abernon Residents' Association; 19
July 2022**

Introduction

The site is best known as a popular children's playground. It is situated opposite the Old Plough pub on the corner of Station Road and Stoke Road. The site is owned and managed by Elmbridge Borough Council and is currently known as Station Road Recreation Ground.

History

The local church's parish magazine of August 1906 describes how "formerly practically waste ground" had been arranged by volunteers as a recreation ground for the benefit of residents. Asphalt paths were laid out and a see-saw, slide, seats and tables were erected.

In November 1946, the Women's Institute planted 11 cherry trees in memory of the ten servicemen and one service woman who died while serving their country during World War 2. Over subsequent years, this memorial became forgotten and some of the trees died. Then in 2021, it was discovered by Cobham Heritage that the site is formally recorded as a war memorial on the website of the Imperial War Museum.

Immediately, the Stoke D'Abernon Residents' Association, working in conjunction with Elmbridge Green Spaces Department, prepared a plan to upgrade the site to reflect its status as a war memorial. The plan was as follows:

1. Remove 5 dead trees and several stumps and branches
2. Retain 6 healthy existing trees and plant 5 new trees, which means that here are now 11 trees again.
3. Plant a privet hedge as a shield against traffic headlights and noise.
4. Install two new quality benches made from recycled material
5. Install an explanatory board, explaining the history of the site (a second identical board is on order)
6. Re-name the side: Stoke D'Abernon Memorial Park

An application to the Elmbridge CIL fund was successful and up to £24,813 was awarded to cover the costs of the above.

The memorial park will be commemorated on 27 September by the local vicar and guests will include the Mayor of Elmbridge, councillors and council officials.

Conclusion

Given the historical importance of the site and the popularity of the park as a play area, we request that the site be given Local Green Space designation. The Local Plan criteria are addressed as follows:

Proximity: the site is in close proximity to the community

Demonstrably special: it has historical significance as described above, has high recreational value, and is suitable for tranquil reflection

It is local in character: the site, along with the pub opposite, appears in photos dating back to 1904.

Other criteria:

Beauty: All the sub-criteria are met comfortably (suggest score 5)

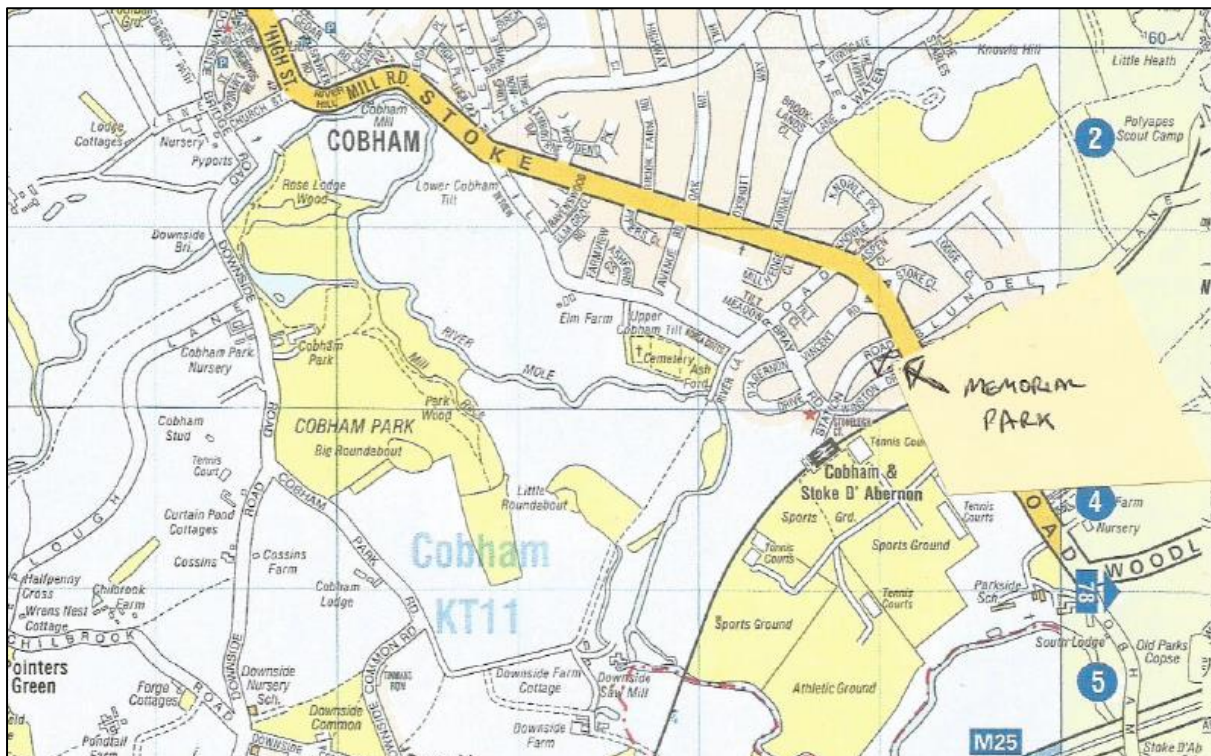
Historic significance: as described above (suggest score 4)

Recreational value: much used and much loved (suggest score 4)

Tranquillity: the site is surrounded by hedges and trees. It is near a busy road but is well shielded (suggest score 3)

Wildlife: difficult to measure but there are many trees, hedges and bushes which provide a haven for birds and insects (suggest score 4)

Total suggested score: 20



Appendix 2: Representation from Portmore Park & District Association

Grotto Road Recreation Area Weybridge

(aka 'the football field' or Greside Road Green Space)

Not yet assessed for inclusion as a Local Green Space in the draft Local Plan

This is an EBC owned public football (half-)field and practice goal, at the end of Greside Road, adjacent to the Broadwater Path, partly edged with trees.

It is a few metres from the houses in Greenlands Road and Greside Road.

Historically it was surrounded on three sides by agricultural land – variously known as part of Greenlands Farm, Oatlands Farm, or Dairy Farm – **but this is no longer the case.**

Since the surrounding land was purchased by St Georges' Weybridge Junior School, it has had a change of use to **school playing fields.**

There are school buildings to its west, further houses to the north along Walton Lane, and Health Club buildings and car park to its east, making the land essentially urban green space.

The land has a long history of planning applications for residential development, and for sports and recreational facilities, and this is expected to continue. There is local concern that it should be protected as a Local Green Space.

As illustrated and described below, a Local Green Space designation could usefully also include the immediately adjacent EBC owned section of Broadwater which was recently dredged and restored, to create greater wildlife habitat diversity.



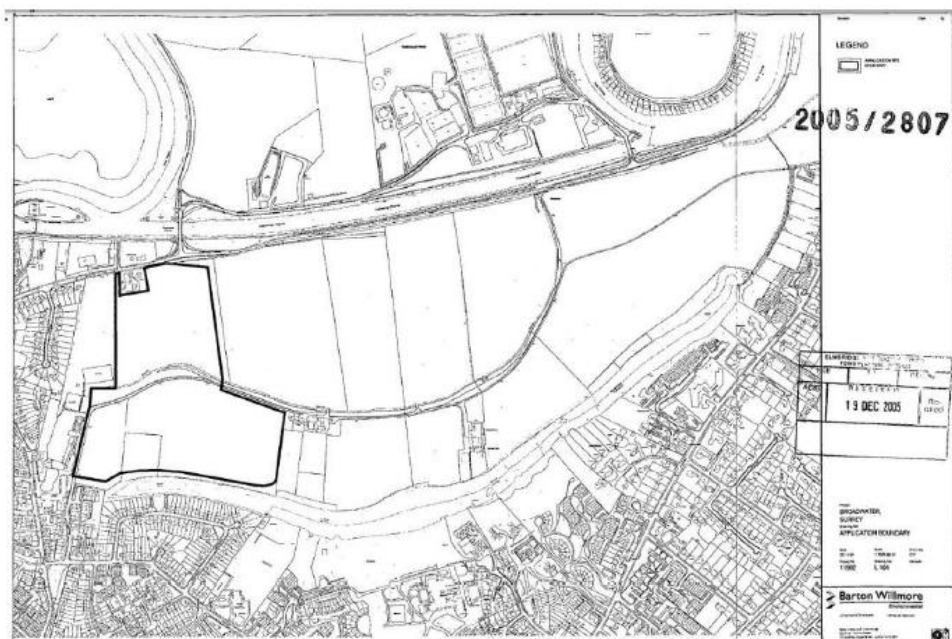
Grotto Road Recreation Area plus EBC owned part of Broadwater

Value to townscape, sense of place, recreation and nature habitats

- This local green space attracts young people for its recreational value, and many passing residents, dog walkers and visitors enjoying the Broadwater Path.
- It is part of the local Green Belt landscape, contributing to local character and setting, adjacent to the built environment but screened from the nearby buildings by trees (and EBC has recently planted some more trees on the edge of the field).
- Its main recreational uses are football practice and walking. It includes a practice goal, and a section of Broadwater Path (Public Footpath 40).
- Although there is now built environment adjacent or very nearby on all sides, making former farmland essentially urban, it is very tranquil and away from roads.
- This local green space (including the stretch of Broadwater) is rich in multiple wildlife habitats.
- It would benefit from a bench or two, if EBC can afford that, to increase its recreational value to those among the many walkers who wish for somewhere to sit.
- It could perhaps be formally renamed, e.g. "Grenside Road Local Green Space" – or there could even be a local competition to name it properly.

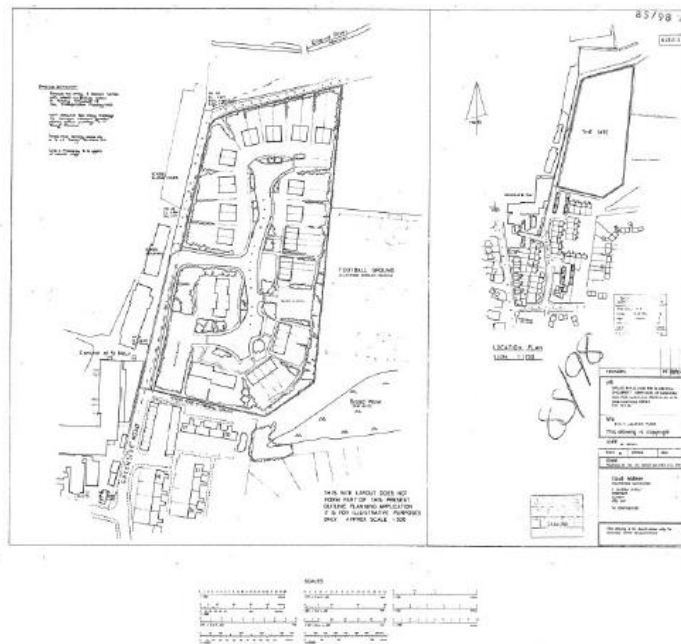
Some planning history

2005/2807: Scoping Opinion in Connection with Proposed Residential Development, Recreation Ground, Car Parking, Access and Associated Landscaping at Greenlands Farm, Broadwater, Weybridge



2005/2807 site including Grotto Road Recreation Area

1985/0098 - Land north of 17 to 20 Grendside Road and west of Greenlands Farm Grendside Road Weybridge Surrey KT13 8QA. Application for residential development, extending Grendside Road.



WAL/1961/7696 - Dairy Farm, Grendside Road, Weybridge, KT13 8QB
Application for extensive residential development.

(no map, but it included the area in question)

This former agricultural land has so far been protected from housing development by being in the Green Belt, or by limited access.

Adjacent parts of the former farms have not been protected from becoming a Health Club and associated extensive tarmac car park, plus the two new tarmac access roads from Walton Lane (to the Bannatyne Health Club and to the recently developed Abrook Farm equestrian centre further east).

Many residents are concerned that the Grotto Road Recreation Area is within land which is now essentially urban, and is insufficiently protected as Green Belt, and that the green space of the Grotto Road Recreation Area and section of Broadwater should be formally protected by being given Local Green Space status.

Thames Street Weybridge Green Space

Not yet assessed for inclusion as a Local Green Space in the draft Local Plan

Green Space between Genside Road and Thames Street, comprising Elmbridge Borough Council LAA 2021 US401 plus a further strip of tree filled green.

Under threat of future development. Put forward for development for housing in LAA 2018.

Assessed in LAA 2021 US401 as not for development in the next fifteen years as it is Green Space, but with no recognition by EBC of the significance of its mature trees.

Portmore Park & District Residents Association (PPDRA) commissioned a tree survey of this green space, which we include below.

Value to townscape, sense of place, recreation and nature habitats

This is a significant stretch of green space in a residential area close to the centre of Weybridge.

Greatly valued by residents, it appears to meet the criteria for recognition as a Local Green Space:

- essential to the local townscape - key to the character of this end of Thames Street
- visually attractive, with mature trees and mown grass
- highly visible from all directions
- significant to the view approaching from the Monument Green Conservation Area
- contributes to the local sense of place
- has multiple publicly accessible informal recreational uses
- within a residential area in central Weybridge, it offers tranquillity, and has low levels of noise and visual intrusion
- multiple habitats for wildlife – birds, squirrels and other creatures – in the mature trees

Location of the Thames Street Weybridge Green Space



Thames Street Weybridge Green Space



Thames Street Green Space viewed from Grotto Road



Thames Street Green Space viewed from Monument Green Conservation Area



Thames Street Green Space viewed from Thames Street, looking NNE

Submission to EBC re including Thames Street Weybridge Green Space as a Local Green Space in the Local Plan

Thames Street Weybridge Green Space Tree Survey

In response to the LAA, PPDRA commissioned a tree survey of the Thames Street Green Space:

**6, Camden Cottages,
Church Walk,
Weybridge,
Surrey KT13 8JT**

17th March 2022

Elmbridge Borough Council,
The Civic Centre,
High Street,
Esher,
KT13 9SD. **(Via email: tplan@elmbridge.gov.uk)**
Attn. The Senior Tree Officer.

Dear Sir,

Ref: Thames Street, Green Space - KT13 – Proposal to protect trees.

As a retired horticulturalist and a former manager of open spaces I was asked by the Portmore Park District Resident's Association (PPDRA) to survey the trees on the Thames Street Green Space to consider if there were trees that merit safeguarding with a TPO.

Having looked at the site many trees form a significant feature, visible from public spaces in all directions, which local residents consider should be protected. A number are fine looking specimen trees. The PPDRA was surprised to find that no tree on this prominent green space appears on the current Elmbridge TPO register.

The PPDRA request that you list at least the following seven trees:

- 1) Oak tree opposite 17 Thames Street approx. 18 metres.
- 2) Lime tree opposite 27 Thames Street 18 metres+
- 3) Lime tree opposite 29 Thames Street approx. 18 metres.
- 4) Oak tree opposite and beyond in line with 31 Thames Street approx. 16 metres
- 5) Oak tree opposite Farnell Mews entrance approx. 14 metres.
- 6) Oak tree beyond Oak 5 in line with Farnell Mews approx. 16 metres
- 7) Sweet Chestnut beyond Oak 6 in line with Farnell Mews approx. 12 metres

Many of the trees have substantial amenity value and warrant (TPO) safeguarding we request that you visit the site to consider this proposal.

Yours faithfully,

Walton Lane Weybridge Open Space

Not yet assessed for inclusion as a Local Green Space in the draft Local Plan

This is a much-used EBC open space adjacent to the River Thames next to Elmbridge Canoe Club. It comprises mown grassland and mature trees, multiple wildlife habitats, and (in EBC words) a 'magnificent riparian panorama' of the Thames around D'Oyly Carte Island and Desborough Island. It has EBC-provided metal picnic tables and seats, and includes a small EBC car park with a porous gravel and plastic surface. It is sheltered from Walton Lane traffic by double hedges.

The substantial Elmbridge Canoe Club building is immediately to its east, and a private dwelling is to its west behind mature trees and shrubs.



Walton Lane Open Space

Value to townscape, sense of place, recreation and nature habitats

This cherished green open space is adjacent to the Thames Path and National Cycle Route, and provides a welcome Weybridge stopping off and resting point, or simply a delightful place to visit, to picnic, or perhaps have a coffee from a stall next to the canoe club. It is also highly popular with families and those of limited mobility because of the convenient parking.

- This green space is visually highly attractive, a destination to contemplate the Weybridge Thames riverside panorama.
- It contributes to the local landscape, character and setting, local identity, and sense of place.
- Its main informal recreational uses are admiring the riverside view, sitting, playing, picnicking, exercising, meeting friends.
- This space is also the centre of more formal community recreational activity associated with the hugely popular Elmbridge Canoe Club.

Submission to EBC re including Walton Lane Open Space Weybridge as a Local Green Space in the Local Plan

- It is delightfully tranquil, sheltered from Walton Lane traffic by a large twin hedge (which local residents persuaded EBC to retain in 2005 when the space was opened up to the riverside, to provide an acoustic and visual screen from the road).
- The space is very rich in wildlife habitats, with ample riverside flora and fauna and magnificent mature trees.

While this EBC Weybridge open space receives some protection from development by being in Flood Zone 3, there is concern that its green nature and wildlife habitats deserve to be better protected, for example from the risk of greater encroachment by built structures and synthetically surfaced facilities, by it being given formal Local Green Space status.

Appendix 3: Representation from Thames Ditton and Weston Green Residents Association.

We believe that 4 of the sites that were considered (and rated), but not designated, as Local Green Space should be included for the following reasons.

1/ Esher College - We see no reason why the Esher College site should be treated differently to the Tiffins' Sports Grounds - They are both in close proximity to each other and both abut the Hampton Court Way. The Esher College site has historic significance being part of what was the old Weston Manor Farm dating back to the Domesday Book.

2/ Ditton Marina - We disagree with the low assessments given in terms of recreational value, tranquillity and wildlife - we believe that an overall assessment of at least 14 would be appropriate to this site on the banks of the River Thames. Public access to the various facilities on the site are widely used.

3/ Ditton Field and Fieldsave - We believe that these two sites should be considered together as they form one contiguous piece of land which provides the setting for Grade 1 listed Hampton Court Palace. The site also provides an important part of the protected strategic views from Hampton Court Palace to the Surrey Hills.

Appendix 4: Representation from Susan Mealor

1.

Do you consider this part of the draft Local Plan to be legally compliant?

You must provide an answer to this question.

Yes No

Please add your comments

The criteria for registering local green spaces emphasises repeatedly that there must be a benefit to the local community. It is my assertion that private land should not be included in the open spaces sites as they are inaccessible to the community at large. In particular I refer to reference to Number 30 : Wooded area in Burwood Park area D.

since there is no community benefit, this site should not be included in a legal document.

2.

Do you consider this part of the draft Local Plan to be sound?

You must provide an answer to this question.

Yes No

Please add your comments below

2.2 As part of the NPPF (first published in 2012), the Government introduced a new designation to protect local green areas which are valued by local communities.the opportunity to identify and protect areas that are of particular importance and value to the community.

2.4 Setting out the circumstances for using the designation, paragraph 102 of the NPPF continues that, "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, healthy community. Green or open space ...can provide tangible health and wellbeing benefits such as promoting healthier lifestyles through recreation uses and encouraging social interaction within a community. As well as these health and wellbeing benefits, green spaces can also improve the visual amenity of particular area...

With specific reference to Number 30 : Wooded area in Burwood Park area D.

The site should be removed as there is no access to the community of Hersham, only for the residents who own it.

Therefore it is not sound to include it as there is no benefit to the community

3.

If you do not consider this part of the draft Local Plan to be sound, please select which test/tests of soundness this relates to.

- Positively prepared
- Effective
- Justified
- Consistent with national policy

Please provide an explanation below

Not positively prepared, effective or justified.

Local Green Space Study April 2022 states: "Demonstrably Special to a Local Community" . A private estate is no more accessible than a private back garden.

The criteria for registering local green spaces emphasises repeatedly that there must be a benefit to the local community, for example:

5.12 High quality green space..... is a vital part of a vibrant and healthy community. Green or open space ...can provide tangible health and wellbeing benefits such as promoting healthier lifestyles through recreation uses and encouraging social interaction within a community. As well as these health and wellbeing benefits, green spaces can also improve the visual amenity of particular area...

5.13 National policy recognises the importance of particular green areas to local communities These spaces are demonstrably special to the local community

Whilst this site may well be attractive, it is in a private estate that is totally inaccessible to the local population, which is the Community of Hershaw (even though for EBC purposes only, it comes in area designated Weybridge).

Not only is the estate private and exclusive, it is a fact that during the worst days of the Covid crisis when the community was severely restricted in travel and movement from home, the owner/residents of this private estate employed security guards specifically to keep all non-residents out.

Since the last public consultation early 2020 , the owner/residents have installed locked gates on roadways and foot entry points and it is patrolled by security guards to keep allcomers out.

Thus it is clear that the local population has no contact or ability to access this site. The sole benefit is to the owners.

It must be removed from the plan.

I would further suggest that no sites within private gated and therefore exclusive estates be included as green places. All developments on such sites are within the remit of the owners anyway, and presumably subject to normal planning regulations, tree preservation orders, etc

It is my assertion that this type of private land should not be included in the open spaces sites as they are inaccessible to the community at large.

4.

Please set out the modification(s) you consider necessary to make the draft Local Plan legally compliant and/or sound, including any revised wording.

You must provide an answer to this question.

With specific reference to Number 30 : Wooded area in Burwood Park area D.

The site should be removed as there is no access to the community of Hershham, only for the residents who own it.

The clause reference is ENV3 and this site is also in Appendix A4 of the draft local plan

5.

If your representation is seeking a modification to this part of the document, do you consider it necessary to participate in the oral part of the examination?

You must provide an answer to this question.

Yes, I wish to participate at the oral examination

No, I do not wish to participate at the oral examination

6.

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

Please note: it is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

You must provide an answer to this question.

Reference to Number 30 : Wooded area in Burwood Park area D.

No private exclusive sites should be allowed to be listed as community assets, any more than private back gardens would be. Whilst this is a pleasant area, it has no community access whatsoever. As a private piece of land which specifically excludes the community, it cannot be regarded as a useful asset. It should not be listed but should have normal regulations applied, such as tree preservation orders.

Appendix 5: Representation from Nexus

6. Local Green Space designation

6.1 The Former Moore Place Golf Course is designated as Local Green Space (No.6) within the draft Local Plan. Charterhouse submit however that the site does not meet the criteria set out within either the PPG or the NPPF to justify this designation.

6.2 Paragraph 101 of the NPPF states that (emphasis added):

“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.”

6.3 Further, at paragraph 102, it states that:

“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.”

6.4 Whilst the site is close to existing homes, it has not been adequately evidenced or demonstrated that the site holds a particular local significance. No additional local benefit has been demonstrated by EBC to show what the site would gain by this designation over and above the protection afforded to it by the Green Belt.

6.5 The Former Moore Place Golf Course is fairly large, at 13ha in size. As such, Charterhouse Strategic Land submit that the proposed LGS designation on the site does not satisfy criterion c) being local in character as an extensive tract of land.

6.6 The Landscape Sensitivity Study (2019) notes in relation to parcel RF10-B, which the Former Moore Place Golf Course lies within, that:

“Limited settlement and public access aid the sense of tranquillity, although the sense of remoteness is reduced by surrounding urban influences” (emphasis added)

6.7 Further, the site is not proposed by the Council for release from the green belt and the PPG makes clear that if land is already protected by Green Belt policy, then the LGS designation should only be applied where additional benefit would be gained by having the land designated as such (Paragraph ID: 37-010-20140306).

6.8 Paragraph ID 37-007-20140306 of the PPG, states that when designating any Local Green Space, the Council must ensure that such a designation is:

“...consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making (emphasis added)”

6.9 Accordingly, it is submitted that the designation of the site as a LGS has been generated by the Council to prevent any development coming forward on the site through a 'Very Special Circumstances' case if the site were to be removed from the Green Belt as part of the emerging Local Plan, having recognised that it does not make a meaningful contribution to the purposes of the Green Belt. Its designation is clearly contradictory to sustainable development and undermines plan-making in relation to meeting identified need.

6.10 This designation should be removed from the site as it is not sound.

Appendix 6: Proformas- New sites suggested

Area name: Stoke D'Abernon Memorial Park, Station Road, Stoke D'Abernon

Settlement: Cobham

Area reference: 171

Area size: 0.23Ha

Description: This pocket park is situated opposite the Old Plough pub on the corner of Station Road and Stoke Road.



Beauty

Visual attractiveness	
Contribution to the townscape	X
Contribution to the landscape	
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	X
Contribute to sense of place	X

Score: 3

The pocket park contributes to the general appearance of the built-up area and aids a visual break in built form at a prominent corner plot. The pocket park is small, but its low-level

fencing and mature trees contributes to the look and feel of the area and is typical of this part of the borough which has been described as semi-rural by the community.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	X

Score: 5

This area forms part of the setting of the Grade II statutorily listed The Old Plough public house to the north of the site.

Recreational value

Suitable for a variety of recreation?	X
---------------------------------------	---

Score: 3

There is a children’s play area and there are a number of benches to sit and reflect.

Tranquillity

Is the area visually and audibly tranquil?	X
--	---

Score: 2

Although the site is relatively visually tranquil, there is constant audible intrusion from the A245.

Richness of wildlife

Contains one notable habitat.	
Contains two notable habitats.	X
Contains three notable habitats.	
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 2

There are mature trees within the pocket park and hedging on the boundaries.

Total Score: 15

Result: Designate

Area name: Thames Street Green Space

Settlement: Weybridge

Area reference: 172

Area size: 0.19Ha

Description: The site is a triangular shaped green space that sits between Thames Street, Grotto Road and Grenside Road.



Beauty

Visual attractiveness	X
Contribution to the townscape	X
Contribution to the landscape	
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	
Contribute to sense of place	

Score: 2

The triangular green space is an area of lawn and mature trees that act as a visual green break from the development surrounding all three sides. For this reason, it does help create visual attractiveness in an otherwise urban area and contributes to the townscape in terms of street scene.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
--	--

Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	X
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Score: 5

This area lies within an area of high archaeological potential or importance.

Recreational value

Suitable for a variety of recreation?	X
---------------------------------------	---

Score: 0

It is publicly accessible but has no formal recreational use. There are no benches to sit on within the green space.

Tranquillity

Is the area visually and audibly tranquil?	X
--	---

Score: 2

There is some audible and visual disturbance as the site is located between three roads and housing.

Richness of wildlife

Contains one notable habitat.	X
Contains two notable habitats.	
Contains three notable habitats.	
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 1

The site contains a number of large mature trees.

Total Score: 10

Result: Do not designate

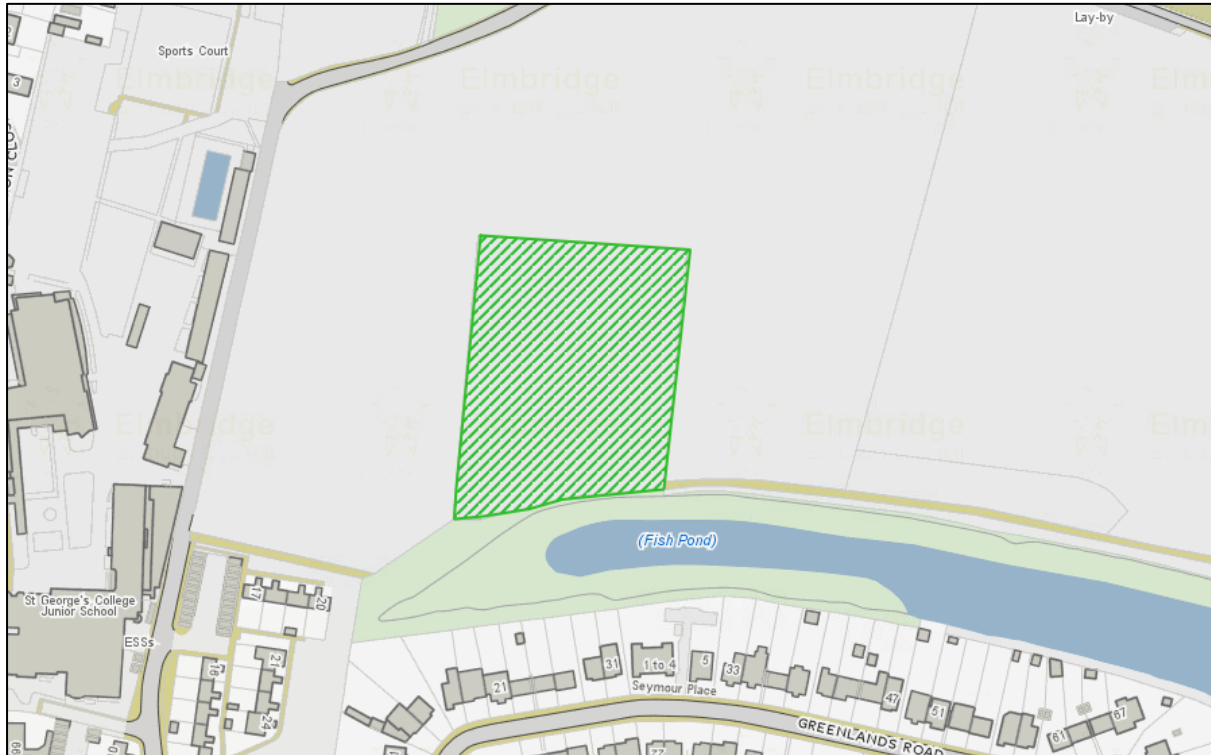
Area name: Grotto Road Recreation Area

Settlement: Weybridge

Area reference: 173

Area size: 0.74Ha

Description: The site is a large green space located next to school playing fields and is publicly accessible via a public footpath.



Beauty

Visual attractiveness	
Contribution to the townscape	
Contribution to the landscape	X
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	
Contribute to sense of place	

Score: 1

The site contributes to the wider open fields and woodlands. However, it is a square area of grass and there is little that contributes to local identity and a sense of place.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
--	--

Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	X
--	---

Score: 5

This area lies adjacent to Oatlands Park which is a park of special historic interest.

Recreational value

Suitable for a variety of recreation?	X
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Score: 1

The site appears to be used for dog walkers.

Tranquillity

Is the area visually and audibly tranquil?	X
--	---

Score: 4

The site is located within a semi-rural area with very little audible or visual disturbance.

Richness of wildlife

Contains one notable habitat.	X
Contains two notable habitats.	
Contains three notable habitats.	
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 1

The site has large mature trees on its boundaries.

Total Score: 12

Result: Do not designate

Area name: Walton Lane Open space

Settlement: Weybridge

Area reference: 174

Area size: 0.66Ha

Description: The site consists of a public car park, picnic tables and play area which is located to the south of the River Thames and north of Walton Lane.



Beauty

Visual attractiveness	X
Contribution to the townscape	
Contribution to the landscape	X
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	
Contribute to sense of place	

Score: 2

Being located along the River Thames, the green space is visually attractive with mature trees within and surrounding the site. It contributes to the non-built-up area of the river and its frontage.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
--	--

Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	
--	--

Score: 0

The area is not within or forms part of the setting of any of the above criteria.

Recreational value

Suitable for a variety of recreation?	X
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Score: 3

The site has multiple publicly accessible informal uses including a picnic area, Sports and Canoe Club.

Tranquillity

Is the area visually and audibly tranquil?	X
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Score: 3

There is little disturbance with low level of noise and visual intrusion.

Richness of wildlife

Contains one notable habitat.	
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Contains two notable habitats.	
--------------------------------	--

Contains three notable habitats.	
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Contains four or more notable habitats.	
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Contains / is within a county / locally designated area of wildlife value.	X
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Score: 5

The site is located within the Thorpe and Shepperton biodiversity opportunity area.

Total Score: 13

Result: Designate

Appendix 7: Proformas- Review of 4 discounted sites

Area name: Fieldsave, Summer Road

Settlement: Thames Ditton, Long Ditton, Hinchley Wood and Weston Green

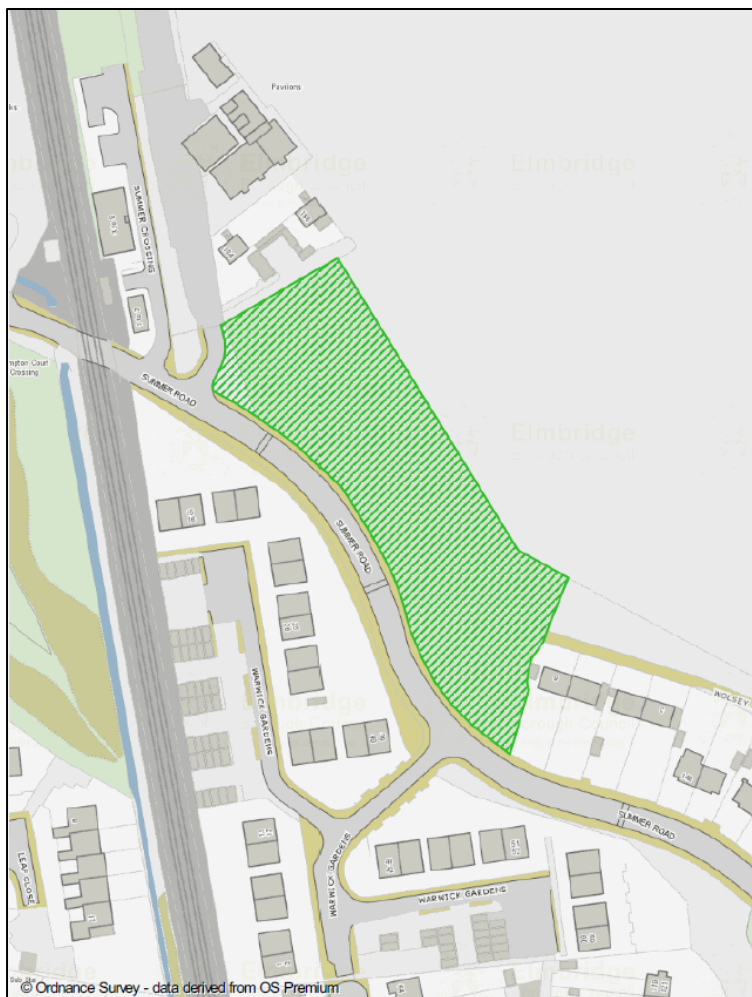
Area reference: 92

Area size: 0.62Ha

Description: This area is a wooded area on the north side of Summer Road, to the south of Kingston Grammar School Playing Fields.

REVIEW AFTER REGULATION 19 RESPONSE

It was suggested that this site is assessed with the neighbouring site, Kingston Grammar Sports Field (103). Confirmed at a site visit held on 16.12.22, it is clear that the two sites are separate and have different uses. Both sites are not publicly accessible and Field Save was surrounded by wire fencing including a locked gate. However, a community group is using the green space to manage bumble bees and there were hives present within the woodland. The assessment below has been reviewed and re-scored.



Beauty

Visual attractiveness	X
Contribution to the townscape	X
Contribution to the landscape	
Contribution to the character and/or setting of the settlement including views to and from the settlement	X
Contribute to local identity and character	X
Contribute to sense of place	

Score: 4

The area is visually attractive in that it forms a large block of mature trees on the northern side of Summer Road, which provides a green buffer for the residential properties, forming part of the townscape and the local character of the area.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	

Score: 0

There is no notable historic significance to this area.

Recreational value

Suitable for a variety of recreation?	
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Score: 0

This site is not suitable for recreation due to the dense nature of the tree cover.

Tranquillity

Is the site visually and audibly tranquil?	X
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Score: 2

Due to this area's location on Summer Road, there is regular traffic that detracts from its tranquillity.

Richness of wildlife

Contains one notable habitat.	
Contains two notable habitats.	
Contains three notable habitats.	X
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 3

The area contains three notable habitats in the form of mature trees, a 'woodland floor' environment and beehives provided by a community group.

Total Score: 9

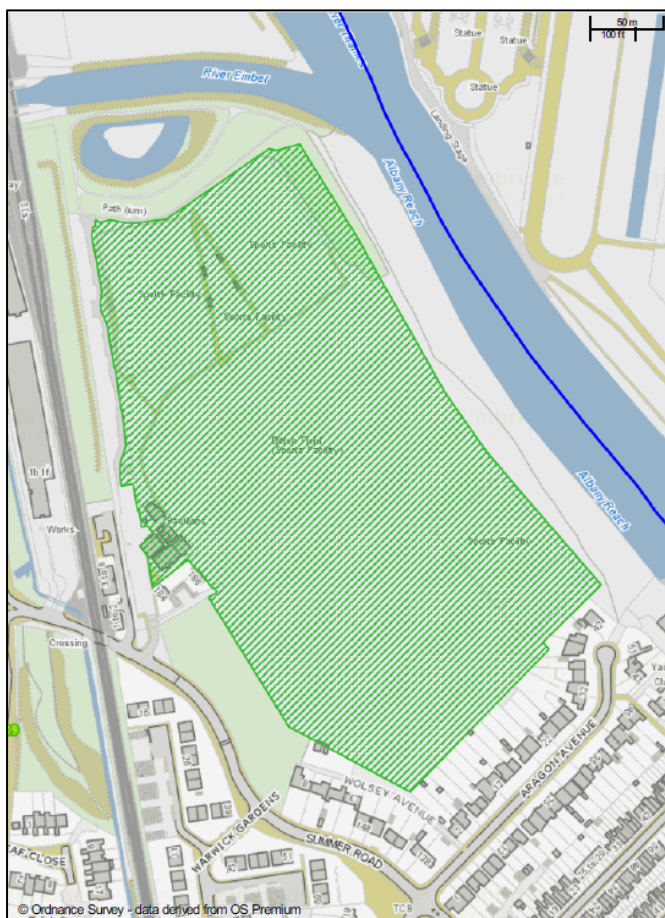
Result: Do not designate

Area name: Kingston Grammar School Playing Fields / Ditton Fields
 Settlement: Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
 Area reference: 103
 Area size: 8.99Ha

Description: The area is a private sports field and contains a number of associated buildings. It is bordered to the north and east by the proposed Local Green Space 'Fieldsave', to the west by the railway line going towards Hampton Court Palace and to the south by residential dwellings.

REVIEW AFTER REGULATION 19 RESPONSE

The site provides the setting for Grade 1 listed Hampton Court Palace and forms an important part of the protected strategic views from Hampton Court Palace to the Surrey Hills. This is most visible from the public footpath to the north of the site.



Beauty

Visual attractiveness	X
Contribution to the townscape	
Contribution to the landscape	X
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	
Contribute to sense of place	

Score: 2

The area is a well-kept private sports field with a number of facilities on some of its edges. It fits into the wider landscape as part of the de-urbanisation going towards the adjacent 'Albany Reach' area which forms part of the setting for the River Thames and Hampton Court Palace.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	X

Score: 2

The area provides the setting for Albany Reach and Hampton Court Palace to the north.

Recreational value

Suitable for a variety of recreation?	X
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Score: 3

The area is suitable for a variety of sporting activities, however as it is a private sports facility there are issues in relation to access to this site. However, it is used by other organisations than the school itself, e.g. Teddington Hockey Club.

Tranquillity

Is the area visually and audibly tranquil?	X
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Score: 4

The area is set back from the road and well screened from the railway line by mature trees and can therefore be considered tranquil.

Richness of wildlife

Contains one notable habitat.	
Contains two notable habitats.	X
Contains three notable habitats.	
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 2

This site contains mature trees and hedges providing two notable habitats for wildlife.

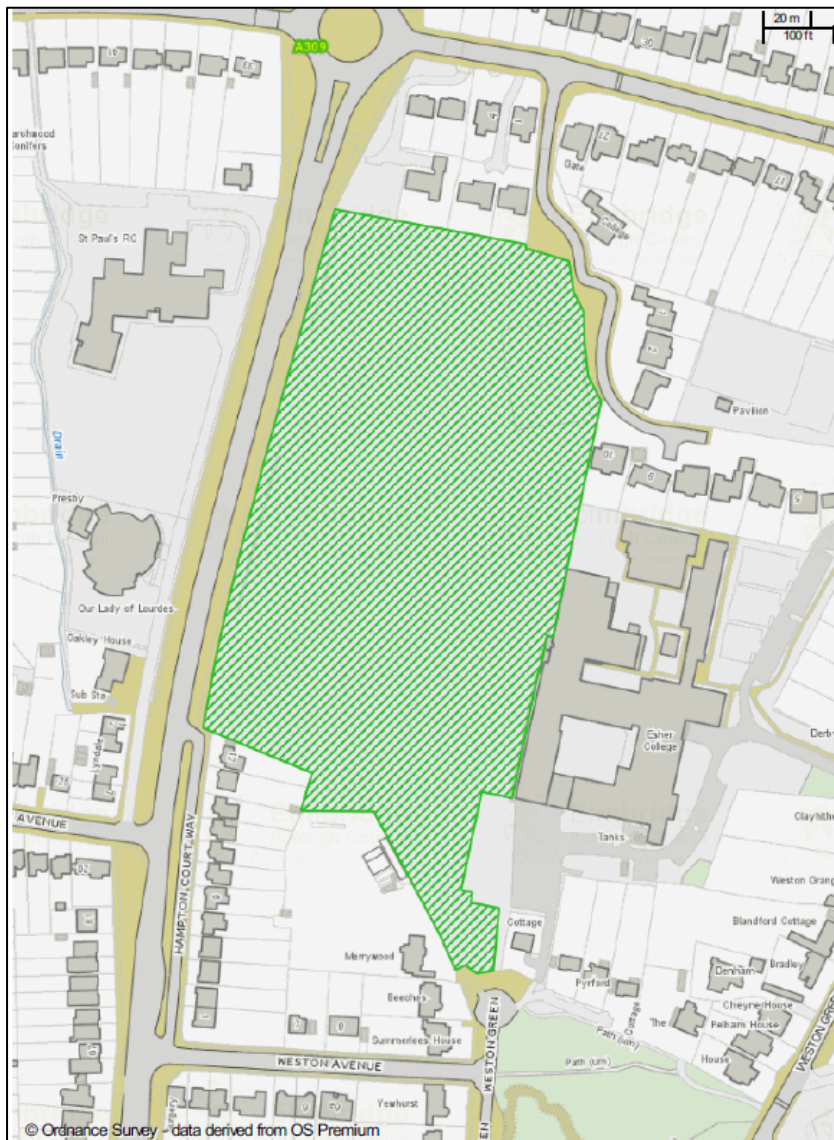
Total Score: 13

Result: Designate

Area name: Land at Esher College
Settlement: Thames Ditton, Long Ditton, Hinchley Wood and Weston Green
Area reference: 104
Area size: 3.76Ha
Description: This is a large-grassed area to the west of the main Esher College buildings, mainly used for sports pitches.

REVIEW AFTER REGULATION 19 RESPONSE

A site visit undertaken on 16.12.22 confirms that this site is self-contained, not publicly accessible and is used by the college. It is not visible from the roadside so does not contribute particularly to the townscape. It was considered by Thames Ditton and Weston Green Residents' Association that the site was similar to area 110 Old Tiffinians but this is different as area 110 contains allotments and is visible from the Hampton Court Way which contributes to the townscape. The assessment has been reviewed and the score remains.



Beauty

Visual attractiveness	
Contribution to the townscape	
Contribution to the landscape	
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	
Contribute to sense of place	X

Score: 1

The area helps provide part of the setting for Esher College, providing a sense of place but does not fulfil any of the other criteria.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	

Score: 0

The area is not within or form part of the setting of any of the above criteria.

Recreational value

Suitable for a variety of recreation?	X
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Score: 2

This site is suitable for multiple formal recreational uses, however as they are located within private property, they are not fully accessible to the community.

Tranquillity

Is the area visually and audibly tranquil?	X
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Score: 3

This area is audibly tranquil, however as it is located adjacent to a large number of buildings it is not notably visually tranquil.

Richness of wildlife

Contains one notable habitat.	
Contains two notable habitats.	X
Contains three notable habitats.	
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 2

This site contains mature trees and hedges providing two notable habitats for wildlife.

Total Score: 8

Result: Do not designate

Area name: Ditton Marina

Settlement: Thames Ditton, Long Ditton, Hinchley Wood and Weston Green

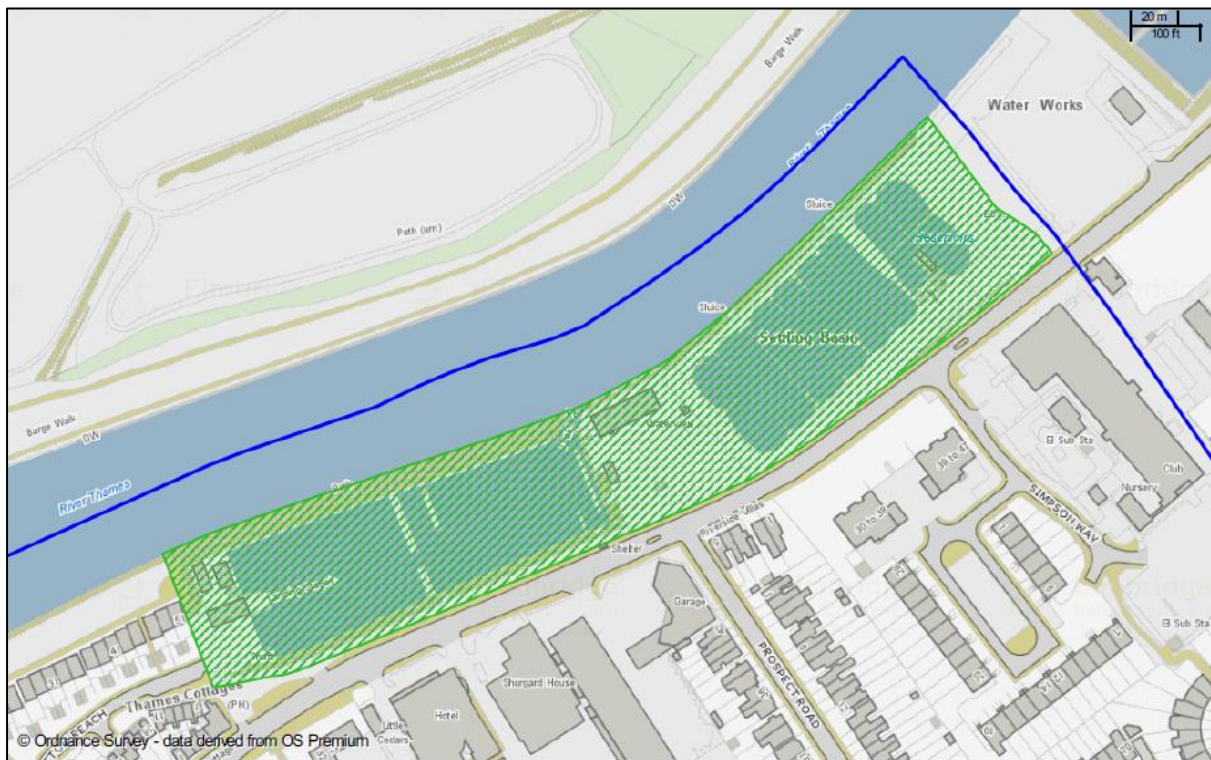
Area reference: 88

Area size: 2.94Ha

Description: The area is a marina situated north of the Portsmouth Road along the River Thames, close to the borough's boundary with The London Borough of Richmond-upon-Thames.

REVIEW AFTER REGULATION 19 RESPONSE

The marina is a dock that stores boats for the use of boating activities. There is very little green space on site with only steep grass banks surrounding the marina/docks. The assessment has been reviewed and the original score remains.



Beauty

Visual attractiveness	
Contribution to the townscape	
Contribution to the landscape	
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	X
Contribute to sense of place	X

Score: 2

The area is considered to contribute effectively towards the identity and character of this part of the borough as it creates a sense place though the focus upon boating activities. There are issues in relation to the access being private and that it is mainly used for commercial boat maintenance which diminishes the attractiveness of the area.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	X

Score: 5

The area provides part of the setting for the Lambeth Waterworks Co. buildings which are grade II Listed Buildings.

Recreational value

Suitable for a variety of recreation?	X
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Score: 1

The area is not a recreation ground nor is it suitable for recreational activities outside of its existing use for boating. The site is also restricted to members only.

Tranquillity

Is the area visually and audibly tranquil?	
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Score: 0

The area's location adjacent to Portsmouth Road means it cannot be considered tranquil.

Richness of wildlife

Contains one notable habitat.	
Contains two notable habitats.	
Contains three notable habitats.	
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 0

This is an active marina and thus does not provide a notable habitat for wildlife.

Total Score: 8

Result: Do not designate

Appendix 8: Proformas- Proposed Local Green Space designations.

Area name: Wooded areas in Burwood Park - Area D

Settlement: Weybridge

Area reference: 166

Area size: 5.38Ha

Description: A long inverse 'L' shaped area that contains trees and a pair of lakes in the centre of Burwood Park estate, with numerous dwellings backing onto it.

REVIEW AFTER REGULATION 19 RESPONSE

The site score remains the same as although not publicly accessible to the wider community of Hersham, it is accessible to those that live in Burwood Park and has met the criteria in terms of beauty, historic significance, tranquillity, and richness of wildlife.



Beauty

Visual attractiveness	X
Contribution to the townscape	X
Contribution to the landscape	X
Contribution to the character and/or setting of the settlement including views to and from the settlement	
Contribute to local identity and character	X
Contribute to sense of place	

Score: 4

This attractive semi-natural area is lined with trees and shrubberies around a pair of lakes. It is unique, adding to the overall townscape (for the dwellings backing onto the area), landscape (due to its significant size) and character of Burwood Park.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	X

Score: 5

The site provides part of the setting for The Manor House, Eriswell Road and Turnpoint, 58 Onslow Road which are Listed Buildings.

Recreational value

Suitable for a variety of recreation?	X
---------------------------------------	---

Score: 2

The area is large enough to walk / dog walk but is within a private area. There are limited access points to the site though which may hamper its effectiveness to perform recreational functions

Tranquillity

Is the area visually and audibly tranquil?	X
--	---

Score: 3

The area is in a quiet residential setting is therefore relatively tranquil.

Richness of wildlife

Contains one notable habitat.	
Contains two notable habitats.	
Contains three or more notable habitats.	

Contains / is within a locally designated area of wildlife value.	X
Contains / is within an internationally / nationally / regionally designated area of wildlife value.	

Score: 4

The site is covered by a community woodlands designation. The site includes watercourses, trees, brambles and hedgerows.

Total Score: 18

Result: Designate

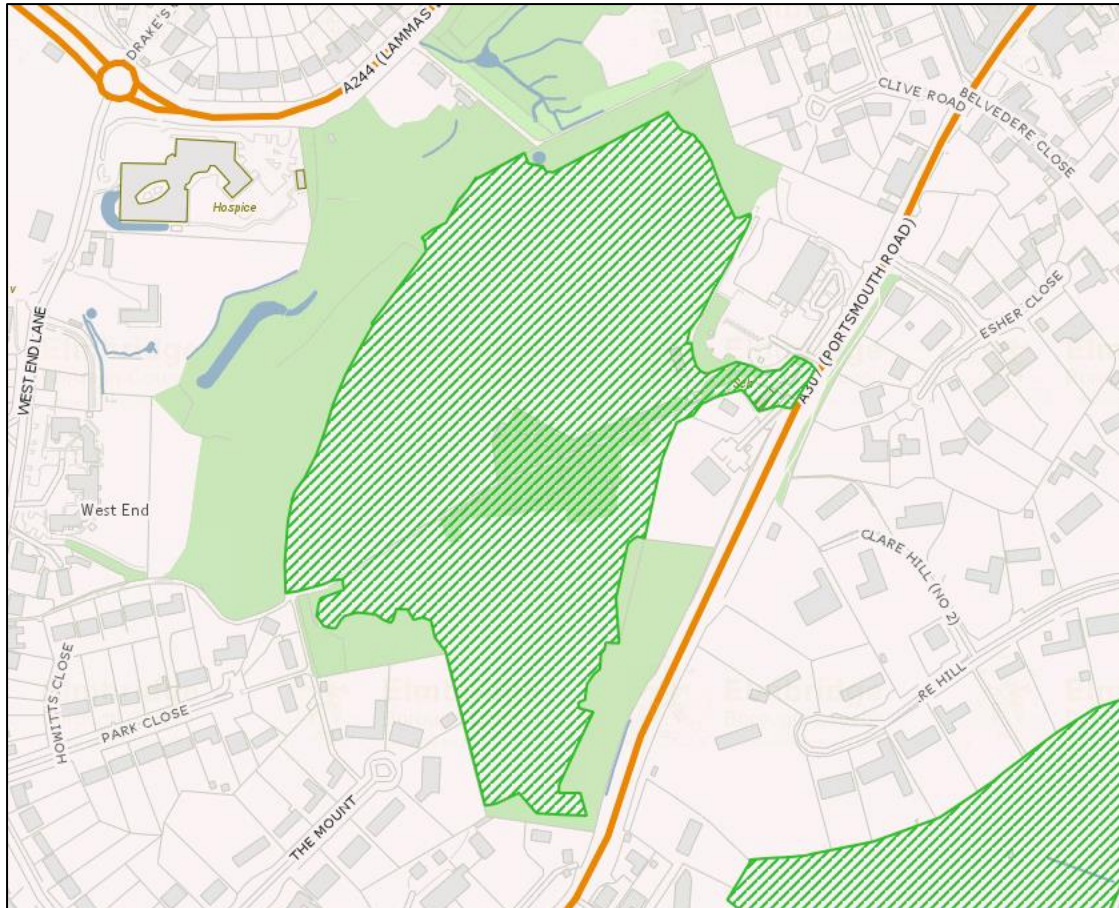
Area name: Moore Place Golf Course

Settlement: Esher

Area reference: 57

Area size: 10.1Ha

Description: A large area of land to the south-west of Esher District Centre. It was previously in use as a golf course, but the company is not currently trading.



Beauty

Visual attractiveness	X
Contribution to the townscape	
Contribution to the landscape	X
Contribution to the character and/or setting of the settlement including views to and from the settlement	X
Contribute to local identity and character	X
Contribute to sense of place	

Score: 4

Although the site was formally a golf club it is not self-contained, and its quantity and layout of mature trees extends across all vistas and viewpoints. A right of way footpath allows public access to the site. Extensive tree cover extends to the wider landscape and thus contributes to the setting of the settlement as well as providing a green break between the urban areas.

Historic significance

Has significant recorded / demonstrable local historical value / provides the setting for a locally listed building.	
Provides the setting for at least one statutory historical designation (this includes Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Areas of High Archaeological Potential).	X

Score: 5

The site forms the setting of three statutory Grade II listed buildings: The Lodge to Moore Place Hotel to the north and Hawkhill Place and 7 The Lodge Old Chestnut Avenue to the south.

Recreational value

Suitable for a variety of recreation?	X
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Score: 1

The area is committed in its entirety to the provision of golfing infrastructure

Tranquillity

Is the site visually and audibly tranquil?	x
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Score: 3

The site suffers from only minor disturbance from the nearby roads

Richness of wildlife

Contains one notable habitat.	
Contains two notable habitats.	X
Contains three notable habitats.	
Contains four or more notable habitats.	
Contains / is within a county / locally designated area of wildlife value.	

Score: 2

The site has a wide range of mature trees and hedgerows.

Total Score: 15

Result: Designate