

NEWCASTLE UNDER LYME BOROUGH COUNCIL OPEN SPACE AND GREEN INFRASTRCTURE STRATEGY CONSULTATION SUMMARY:

Question No I – Do you/or do you not support the 'Vision for Open Space' as set out in Open Space Strategy (Page I2, Open Space Strategy). If not how would you change it?

| | egy (Page 12, Open Space Strate 55%, No – 34%, Blank – 11% | gy). II HOL HOW W | ould you change it: | |
|---|--|-------------------|---|--|
| | Consultee | Yes/No | Comment/Response | Action |
| ı | Questionnaire | Yes | No comment | - |
| 2 | Questionnaire | Yes | No comment | - |
| 3 | Questionnaire | Yes | No comment | - |
| 4 | Questionnaire | | I did not understand the strategy. It seemed to be slanted in planning vernacular rather than wording that the ordinary resident would understand. | The document is written for the local authority to use as its evidence base for the local plan and the language reflects this requirement. |
| 5 | Questionnaire | No | I am concerned for our Green Open Space surrounding Westbury Park known as Rowley Wood. I would like to know in 'plain' English why this area is under consideration given we have so many brown field sites to which you can use? | |
| 6 | Questionnaire | No | Maer & Aston Parish Council felt that there were many inaccuracies in this report. Many of the places mentioned in the report are private spaces and the public are at the very most only able to enjoy the visual aspect. | |
| 7 | Questionnaire | Yes | We'll never know what the future generations will value. Which is a good reason for not allowing open spaces to etiolate. | Noted. Strategies allow provision of new open space when population grows. |
| 8 | Steering Group for the Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan | No | There are serious risks in the proposal to prioritise quality over quantity – see comments on questions below. The final sentence of the vision, 'We will know we have succeeded if we hand over the Borough's open spaces to the next generation and they are able to enjoy its benefits as we have', is also cause for concern. The vision needs to be the generator of a strategy that is 100% certain of success. Instead, it is qualified by doubt. In proposing to prioritise quality over quantity the strategy implicitly proposes to reduce the amount of open space in the borough. | provide the local authority and all landowners with a pragmatic and flexible approach to open space management and land use in the Borough. The focus on 'quality' reflects an underlying theme of multifunctionality and meeting current and future |



| | | | | this Strategy and is a consistent approach reflecting previous work and current practice. No changes to strategies required. |
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| 9 | Cleaner, Greener and Safer Communities Scrutiny Committee | Yes | Any additional comments to be sent to the Chair | Noted. |



Question No 2 – Are the 'Standards for Open Space' proposed in the Open Space Strategy (Table 2, Page 14, Open Space Strategy) in line with your expectations and are they a suitable basis to meet the needs of residents and nature Yes – 33%, No – 44%, Blank – 22%

| - | Consultee | Yes/No/Blank | Comment/Response | Action |
|---|---------------|--------------------------------|--|--|
| I | Questionnaire | Yes | No comment | - |
| 2 | Questionnaire | No | 'outdoor sports facility' NO STANDARD! what's that all about? or does it mean no standard because there aren't any now you are getting rid of Knutton 5g pitches! | Newcastle under Lyme Borough Council has adopted a Playing Pitch Strategy study which deals separately with this issue. |
| 3 | Questionnaire | Yes | If possible it would be good to make the standard for designated play spaces for children and young people more aspirational than the current target of 0.41 per 1,000 especially when compared with the old standard. | The recommended standard for designated play space for children and young people (0.41 ha. per 1,000 population) is equal to the existing provision of 0.41 ha. per 1,000 population. Many local authorities no longer put emphasis on providing LAPs so that better facilities with more to offer can be created and therefore improve opportunities for meaningful play spaces. This helps councils save time and money as the expenses of travelling to and maintaining many small sites with very limited equipment and often far exceeds their benefits. No changes to strategies required. |
| 4 | Questionnaire | | No comment | - |
| 5 | Questionnaire | No | I don't think the council take on board how important it is to have open space in an area already very built up with congested roads and schools at their maximum intake. | Noted. The principle purpose of the strategies is to ensure that communities are provided with appropriate, accessible green space close to where people live. No changes to strategies required. |
| 6 | Questionnaire | No | Please see comment above. If the areas are not accessible due to being in private ownership, then there is an unrealistic expectation. | Noted. No changes to strategies required. |
| 7 | Questionnaire | Generally, yes but see comment | There seems to be a massive reduction in provision of natural and semi natural green space which is at odds with the vision as set out. | The Standard is the same as in the previous Green Spaces Strategy of 2007. Newcastle under Lyme exceeds national and local standards for natural and semi natural greenspace. No changes to strategies required. |



| 8 | Steering Group for the Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan | No | These standards are based on erroneous assessments. The greater proportion of rural sites that have been included in the assessment of 1746.22ha of natural and semi-natural green space are in private ownership and are not publicly accessible (i.e. the public has no right of entry); the fact of being able to see something as one travels past it does not make it accessible. The rural area may be predominantly green in colour, but it is largely privately owned and an industrial area, not an open space free-for-all. In setting standards and planning for provision it needs to be borne in mind that the population of Newcastle-under-Lyme now is projected to grow to 135,500 by 2033 (ONS statistical release, 25 May 2016). Therefore, whatever standard is set, the total quantity of publicly accessible Open Space and Green Space will have to grow to meet the projected need by the end of the plan. | the final document. The quantity standard is based on a per head of population basis so it does follow that an increase in population could result in increased provision if below Standard. |
|---|--|----|---|---|
| 9 | Cleaner, Greener and Safer Communities Scrutiny Committee | | It was noted that the play space had been reduced and members sought the assurance the informal kick about space was still incorporated and would not be reduced. | |



Question No 3 – Do you/or do you not support the 'sub-strategies for Open Space' set out in Chapter 5 of the Open Space Strategy (Pages 15 – 32, Open Space Strategy)? Yes – 33%, No – 22%, Blank – 44%

| res – | 33%, No – 22%, Blank – 44% | V /N /D | C (ID | |
|-------|---|--------------|---|--|
| - | Consultee | Yes/No/Blank | Comment/Response | Action |
| 1 | Questionnaire | V | No comment | |
| 2 | Questionnaire | Yes | i do but i really cant see how the council will truly be able to raise the income needed or get sufficient volunteers to do things when volunteers are already maxed out filling gas left by budget cuts alreadyfor example the dessimation of youth services! | Noted. No changes to strategies required. |
| 3 | Questionnaire | Yes | 5.31 If the Council need support in setting up charitable trusts or looking at how 'new estate' green space could be managed Groundwork WM would happily discuss to see if there is anything we could do. | Noted. No changes to strategies required. |
| 4 | Questionnaire | | No comment | - |
| 5 | Questionnaire | No | Not if it includes our local area! | Noted. No changes to strategies required. |
| 6 | Questionnaire | Yes | | - |
| 7 | Questionnaire | | as having a pressing need for connectivity and corridors. So the objective should be to make green corridors MULTI USER useable | important in providing connected countryside and should be available for a plethora of users in circumstances where public safety can be assured and satisfactiory maintenance can be delivered effectively. No changes to strategies required. |
| 8 | Steering Group for the Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan | No | Quality over quantity strategy. In the absence of fuller detail it is not possible to support a strategy that proposes to focus on quality over quantity and to reassign some Open Spaces to other uses. Agreement in principle is not appropriate when specifics and the risks/consequences for communities are not known. | The view of the Steering group is noted. However, a focus on quality is not new to this Strategy and is a consistent approach reflecting both previous work and current practice. In addition, the Council is required by Government to provide new sites for residential and other development within urban areas at a time when its revenue budgets for ongoing maintenance are coming under increasing pressure. |



There are dangers in the Quality and Quantity strategies and the suggestion that Open Spaces can be rationalised and reallocated to development (p.21). Sites may have their origin in \$106 agreements to fulfil the open space requirements for specific developments. Such sites should not be subjected to quality assessments that result in their being put to alternative uses and in residents (a) losing open space that is integral to locality, (b) being forced to travel further to access suitable open space. The Great Outdoors Survey found that the greater proportion of people preferred to walk to Open/Green Space. There is a danger that opting for quality over quantity will result in inequalities of access. In Newcastle-under-Lyme 22% of households have no car or van (Census 2011); these are among the households that are most in need of access to Open/Green Space. Further, 20.9% of people have poor health and the daily activities of 20.8% are limited (Census 2011); these are the people who are most in need of Open/Green Space close to their home. There is a false logic in planning for quality over quantity because the currently forecast population growth for the borough implies a need for increased provision.

Parish Council's are key partners to the Council and have powers to provide and manage open space within local communities, which the Borough Council would welcome. No changes to startegies required. The quantity standard is based on resident population. As the population grows the requirement for quantity is assessed accordingly against the Standard. Future audits will reflect this observation. No changes to strategies required.

Para. 5.2 It is true that good quality sites can be a tourism asset – but the first priority of provision should be to meet the needs of the borough's residents.

Noted. No changes to strategies required.

para. 5.11 Coordination of access to open spaces with apps and mobile mapping. Mobile internet access is poor to non-existent in rural parts of the borough. Achievement of this facility will require the borough to work with communications providers on the provision of adequate coverage in rural areas.

Noted. No changes to strategies required.

Para. 5.8 Better provision of allotments is needed in the rural area. A driving time of 15 minutes to access allotments represents inequality of access and is not acceptable. All settlements with a village envelope should have allotments either within the village or within walking distance of its boundary.

The standard is consistent with current practice and approaches in many other parts of the country. It is accepted that this is not optimal but is nevertheless realistic and based upon accepted paractice. No change to strategies required.



| hobbii be me alway: no car (which | 5.12 Diversity of provision does need to be made for people with pies and special interests; however, while some such needs could neet through 'duty to co-operate', distance and transport must yes be considered, remembering the 22% of households that have are or van and the 20.9% of the population that have poor health ch may not necessarily prevent them from having a hobby or ital interest). | Agreed. No changes to strategies required. |
|--|---|---|
| | lopment should be plan led. | Noted and accepted. Development will be plan led and the strategies will assist the Council in this regard. Amendment made. |
| througarrang development devel | ugh private maintenance agreements. The implications of such negements need to be fully understood by the residents of lopments and by the public at large. Are open spaces that are ced in this way truly Public Open Space, freely accessible to all ers? Or is accessibility limited to the residents of the specific lopment, i.e. those people who are contributing financially towards maintenance of the open space? If new Public Open Space is to nanced via private maintenance agreements as a matter of itse, then it will be essential to adopt and publicise policies enable the status of such Public Open Space to be clearly erstood by the general public. (See further comment under | The future management and maintenance of open space is discussed in the strategies. No change to strategies required. |
| ensurunder their i respo fundai Who the ul | 5.31: 'regular independent inspections must be undertaken to re standards are being maintained Independent organisations or an anitoring maintenance must provide evidence of maintenance works/inspection regime to the organisation consible for organising maintenance.' This raises questions amental to the neoliberal privatisation of public works and services: a sets the standards? Who will inspect the inspectors? Where will altimate responsibility lie (Where will the buck stop?)? Or, will ody be responsible? | Noted. No changes to strategies required. |



| 9 | Cleaner, Greener and Safer | Members were particularly keen to promote new cross border green | Noted and agreed. No changes to strategies |
|---|--------------------------------|--|--|
| | Communities Scrutiny Committee | corridors and unbarriered access for a number of use groups (walkers, | required. |
| | | riders, cyclists, mobility scooter users, buggy users) with neighbouring | |
| | | authorities including Stoke City Council and Staffordshire County | |
| | | Council. Members were very concerned to ensure local consultation | |
| | | was carried out and viewed this as very important. Members | |
| | | recognised there would be differential areas of management to reflect | |
| | | the different types of use. | |



Question No 4 – Do you/or do you not support the 'Green Infrastructure Vision' as set out in Green Infrastructure Strategy (Page 5, Green Infrastructure Strategy). If not how would you change it? Yes – 55%, No – 33%, Blank – 12%

| 163 - | 55%, No – 33%, Blank – 12% Consultee | Yes/No/Blank | Comment/Response | Action |
|-------|--|--|--|---|
| | | Yes | No comment | Action |
| 2 | Questionnaire | Yes | | - |
| | Questionnaire | | No comment | - |
| 3 | Questionnaire | Yes | No comment | |
| 4 | Questionnaire | No | It seems from what I read that "Green Infrastructure" is no longer planning terminology and has been replaced by open space. Therefore it has no legal value or relevance | Both subjects are covered by Government Planning Practice Guidance and are current. No changes to strategies required. |
| 5 | Questionnaire | No | This may come across as looking out purely for our local area, but I would imagine that all the Green Open Spaces should be not looked at for building until all the brown field sites have been used in both Newcastle Borough Council and Stoke on Trent City Council. They may not be prime building sites unlike our own Green Space but the councils need to look to future generations and once these sites have gone just where will we be able to exercise without taking to the car. We all need open spaces for our general well being and already built up, highly congested areas should be left alone for the good of everyone. | Comment noted. The principle purpose of the strategies is to ensure that communities are provided with appropriate, accessible green space close to where people live. No changes to strategies required. |
| 6 | Questionnaire | Yes | However please see earlier comments | Noted. |
| 7 | Questionnaire | The term vision is not used on that page | This document could do with its own vision statement | Vision statements have been included. |
| 8 | Steering Group for the Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan | | The vision is good as far as it goes. How it is translated into practice is another matter. The Green Infrastructure Strategy omits a significant proportion of the rural area. Unless this omission is rectified, these parts of the Borough will not benefit from the Green Infrastructure Vision. | the whole of the Borough. The spatial areas |
| 9 | Cleaner, Greener and Safer Communities Scrutiny Committee | Page 92 Yes | No comment | - |



Question No 5 - Do you/or do you not support the 'Green Infrastructure Spatial Strategy' as set out in Green Infrastructure Strategy (Page 24 - 29, Green Infrastructure Strategy)? If not how would you change it?

Yes - 50%, No - 28%, Blank - 22% Comment/Response Consultee Yes/No/Blank Action Questionnaire Yes No comment Yes Questionnaire No comment 3 Ouestionnaire Yes No comment 4 Produce an Open Space strategy that then give flexibility to be any Ouestionnaire Nο This is reflected in the Green Infrastructure version of green or just a porous area to drain surface water and (GI) strategy. The typology for GI covers all non-sealed surfaces. No changes to strategies replenish aquifers. required. Uir **Questionnaire** No No comment ed. Ouestionnaire Yes However please see earlier comments Noted. There does not Pooling of planning levies p24..a good idea and a review of what could Support for the listed items noted which are **Questionnaire** be asked for from developers..essential p27 Idea of parish Council using appear to be an covered in the strategies. The Government precepts to help fund open space a good idea..but overall open space has recently announced changes to relevant easy to follow is a Boro'universal asset and costs should really be covered by all Boro' strategy on these regulations covering Community pages on which to residents Infrastructure Levy. No changes to strategies comment required. The Green Infrastructure Strategy covers the Steering Group for the Chapel & The Spatial Strategy omits significant parts of the rural area that make No & Yes Hill Chorlton, Maer & Aston and important contributions to the borough's Green Infrastructure and are whole of the Borough. The spatial areas Whitmore Neighbourhood well endowed with PRoW and minor country lanes suitable for walking. were determined through a landscape For example, the strategy omits the whole of Chapel and Hill Chorlton planning approach. Those areas not covered Development Plan Parish, the south-eastern and north-western parts of Maer Parish, and by a spatial area are still covered by the western extremities of the rural south-west. Green infrastructure in thematic ones. However, it is accepted that these areas includes woodlands, wetlands, and significant areas of this may not be obvious and so a change will peatland, and wildlife corridors via watercourses, hedgerows, tracks, and be made to reflect this observation. green lanes. E.g. Chapel and Hill Chorlton Parish has 5 Local Wildlife Sites; another 13 potential Local Wildlife Sites have been identified so far by the Staffordshire Wildlife Trust. The parish also has an excellent network of PRoW that connect to PRoW in Maer and Whitmore parishes and across the border in Stafford borough. It also has tranquil places that offer magnificent views of a stunningly beautiful countryside. The epigraph of the Open Space Strategy quotes the words of Octavia Hill: 'We all want quiet; we all want beauty for the refreshment of our



| | | souls.' Many urban dwellers and other visitors – in addition to the rural | |
|---|--------------------------------|---|---|
| | | community – would find this need fulfilled in these places. | |
| | | | Agreed and amendment made. |
| | | Table 3 (p.17) deals with the challenge and opportunity of 'Making Green | |
| | | Infrastructure central to the future economy'. It focuses almost entirely | |
| | | on the urban area and makes only a passing reference to 'the high quality | |
| | | environment of the Borough's rural area'. A wide range of leisure | |
| | | activities that come under the general heading of 'tourism' are of major | |
| | | importance to the revival of the rural economy because they can provide | |
| | | landowners and the agricultural sector with opportunities for | |
| | | diversification. | |
| | | diversification. | Noted and supported. No changes to |
| | | Table 3 also considers the challenge and opportunity of 'Improving the | |
| | | Green Infrastructure network and its connectivity'. The network and | su ategies i equii eu |
| | | connectivity of PRoW in the areas mentioned above, the maintenance, | |
| | | preservation and connectivity of woodlands and wetlands, future- | |
| | | proofing interventions such as succession planting where trees are past | |
| | | maturity, protection of peatlands, and sensitive management of West | |
| | | Midlands Meres and Mosses sites to maintain optimum water tables, | |
| | | water quality, and vegetation are essential interventions for the | |
| | | improvement of the Green Infrastructure network and its connectivity | |
| | | | |
| | | in these areas. They will require the partnerships envisioned in the Vision | |
| | | on page 5 – between the Borough, landowners, and other partners such | |
| | | as the Staffordshire Wildlife Trust. | |
| | | \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\ | Noted. HS2 is a National infrastructure |
| | | N2 and G3: Yes. We support the strategy to make use of the disused | project. No changes to strategies required. |
| | | Silverdale-Market Drayton railway line. This would provide | |
| | | opportunities for cyclists, walkers and non-car-owners to access the | |
| | | rural south-west from the urban area, avoiding unsuitable and dangerous | |
| | | primary routes. The railway merges into a track to the north east of the | |
| | | village of Aston. However, the Borough needs to be highly pro-active on | |
| | | this because the planned route of HS2 Phase 2A crosses this railway | |
| | | track and a valuable opportunity could be lost. | |
| 9 | Cleaner, Greener and Safer | The question is unclear, members felt it was a poor question and | Noted. However, the text nevertheless sets |
| | Communities Scrutiny Committee | members were unsure what they should be looking at. | out what the green infrastructure strategy |
| | · | | aims to do. No change to strategies |
| | | | required. |
| | | I | 1. 240 22. |



Question No 6 - Do you/or do you not support the 'Green Infrastructure Thematic Strategy' as set out in Green Infrastructure Strategy (Page 30 - 32, Green

Infrastructure Strategy)? If not how would you change it? Yes - 50%, No - 28%, Blank - 22% Consultee Yes/No/Blank **Comment/Response** Action Questionnaire Yes No comment Yes **Questionnaire** No comment Ouestionnaire Yes No comment No 4 Ouestionnaire No comment No **Questionnaire** No comment 6 However please see earlier comments Noted. No changes to strategies required. Questionnaire Yes Ref investment strategy..many activities do not require much complex Ouestionnaire Comment noted. The Council continues to investment ...perhaps just the RIGHT to be there Volunteer support community groups and other strategies...the smaller organisations will collapse without secured stakeholder organisations with advice and funding eg especially Community Chest ..and an important role for NBC guidance. Details are available elsewhere and is to guide groups how to tap other funds..this appears to have in other strategies. No changes to strategies disappeared from the Boro's offer over the years required. Steering Group for the Chapel & Noted. A focus on quality is not new to this Yes & No TI: No. See caveats above. (Questions) Hill Chorlton, Maer & Aston and Strategy and is a consistent approach Whitmore Neighbourhood reflecting both previous work and current Development Plan practice. T2: Yes. No changes to strategies required. T3: Yes. No changes to strategies required. T4: No. Any loss of green infrastructure should be very strongly resisted. Noted. The principle purpose of the If a green space is poorly performing, the question why should be asked strategies is to ensure that communities are and remedies sought; if it is thought to be surplus to requirements, future provided with appropriate, accessible green need should be considered; if it is thought to be 'in the wrong place', the space close to where people live. It should be green space, its use and its surrounding area need to be studied noted that Parish Council's are key partners perceived wrongness of place might be remediable by making changes in to the Borough Council and have powers to the surrounding area, with no loss of the green space. provide and manage open space within local communities, which the Borough Council would welcome. No changes required to the stategies. T5: Yes. No changes to strategies required.



T6: Yes. But urban food production can never substitute for food Comment noted and accepted. There are production in the rural setting. Consider establishing an already community food intiatives in the urban/community farm. Can a suitable site be found in a location such as Borough. Parish Councils and other Silverdale or Chesterton? See Heeley City Farm in Sheffield, stakeholders are able to pursue new ones https://www.heeleyfarm.org.uk/. Such ventures have educational, social with co-operation from the Borough Council. and health and wellbeing benefits, and can have aspiration/career benefits | The Borough Council also has an Allotment for young people.

Stategy. No changes to the strategies required.

T7: No. This theme presents something of a mixed message and conflicts | Green Infrastructure is the basis for Nature with other messages in the Open Space and Green Infrastructure Based Solutions, which are being promoted strategies. The financial constraints of maintaining the borough's Open Space are a key message: in view of this it is difficult to see how Green Infrastructure would 'make a large impact in respect of employment'.

as alternatives to engineering solutions. This presents the opportunities for funding switches to different forms of infrastructure investments. No changes to strategies required.

T8: Yes. But adequate provision (quantity) of locally accessible open Noted and agreed. No changes to the space will be required for such a programme. Participation by the people strategies required. who would derive most benefit from such programmes is most likely to be achieved when the offer is close to home.

T9: Yes.

No changes to strategies required.

T10: Yes.

No changes to strategies required.

TII: Yes. The Borough Council should go further than is suggested and Comment noted. No changes to strategies (a) seek partnerships with the responsible bodies and (b) participate fully required. in consultations on national and regional infrastructure that affects the Borough so as to influence decision making.

T12: No. We have major reservations about some of the County Comment noted. No changes to strategies Council's landscape assessments. These have on occasion resulted in required. poorly sited developments and damage to valued and historic landscapes, e.g. the Kier development at Baldwins Gate.



| | T13: Yes. This should be the case even in localities that do not have an NDP. Local voices should be listened to, respected and given due weight. E.g. local residents in rural areas have an intimate knowledge of and concern for their local areas and their ecology, wildlife/wildlife corridors, opportunities, vulnerabilities and risks. | required. |
|--|---|---|
| Cleaner, Greener and Safer Communities Scrutiny Committee | Members agreed to look through these individually. T4. Offsetting agreed areas in principle but should be maintained as part of the overall public space. | Noted. No changes to the stategies required. Noted. No changes to the strategies required. |



Question 7 - If you think there is an alternative site that should be included within the 'required to meet local standards' lists, please say which site it is, which site would you exclude and why? Please be specific. **Comment/Response** Consultee Yes/No/Blank Action Questionnaire No comment Questionnaire No comment 3 **Questionnaire** No comment Ouestionnaire The Stubbs Walk area is only mentioned as a children's play area. This Comment noted. This site is required to suggests the rest of the tree planted grassland and walkways are being meet local open space provision standards. ignored as an asset for residents and visitors despite celebrating No changes to the strategies required. their bicentenary this year. This bicentenary seems to be being ignored by the Borough Council too. As previously stated, I am most concerned about Rowley Wood being Comment noted. No changes to strategies Ouestionnaire used for prime building land in the future. I would think that the land at required. the bottom of Keele Bank would be more suitable with roads already in place to take the extra volume of traffic, should the council need to build on prime land, again I would reiterate, any brown field sites first, The land which the old Brittannia Ground is also a possibility. There is no public land in our Parish. There is a small area around the Comment noted. Parish Council's are key **Questionnaire** War Memorial which the Parish Council looks after, ie mowing of partners to the Borough Council and have grass, tidying, weed killing etc. However this land is privately owned powers to provide and manage open space within local communities, which the Borough Council would welcome. No changes to strategies required. Ref 1016 Bateswood bridle paths,..this should **not** be plural ..there is Comment noted and amendment made. Ouestionnaire only one ..and it is a Right of Way ..and therefore comes under the County plan s eg Rights of Way Improvement Plan Exclude site 409, reference 421, A51 roadside verge, Maer, 'amenity Comment noted. Added to Action Plan with Steering Group for the Chapel & Hill Chorlton, Maer & Aston and greenspace'. The assessment of this unmaintained verge on a busy recommendation for site management Whitmore Neighbourhood primary route with a nominal speed limit of 50mph as 'Amenity review. greenspace required to meet local standards' is beyond comprehension. Development Plan The A51 in this area is used by commuter traffic between Woore/Nantwich and Stafford/Stone, has significant HGV traffic and farm traffic, including convoys of tractors with large trailers or agricultural machinery, is a biker route, and is a diversion route for motorway traffic when lanes/carriageways are closed on the M6. Further,

because this is a primary route the verge is under SCC Highways control.



| 9 | Cleaner, Greener and Safer Communities Scrutiny Committee | This should be entirely open to public consultation. Members requested clarification of 1 in 1 out. | Comment noted. No changes to strategies required. |
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Question 8 - Do you consider it to be an option to reduce current maintenance levels on sites which are not required to meet open space needs? If so what sort of reduced maintenance do you think might be acceptable?

| sort | ort of reduced maintenance do you think might be acceptable? | | | | | | |
|-------|---|--------------|--|---|--|--|--|
| Yes - | es – 55%, No – 45% | | | | | | |
| - | Consultee | Yes/No/Blank | Comment/Response | Action | | | |
| ı | Questionnaire | No | No comment | - | | | |
| 2 | Questionnaire | No | No comment | - | | | |
| 3 | Questionnaire | Yes | Wildflower meadows instead of closely cut grass, sections of sites left to nature to encourage different habitats to emerge etc. | This is an operational issue to be considered by those managing open space management contracts. Appropriately located wildflower meadows can reduce some forms of management but can increase others e.g. removal of hay at end of growing season. This matter has some merit and is addressed in the strategies. No changes to the strategies required. | | | |
| 4 | Questionnaire | Yes | Country park sites like Apedale seem to be being maintained just to spend their annual budget. They could be largely left to run wild as with the example of Keele Golf Course which shows how "no maintenance" increases wildlife and plant diversity. Users will still access these areas and find them more enjoyable than the over managed sites like Apedale. | Noted however stopping management does not necessarily increase biodiversity and indeed can reduce it by favouring, for example, shrub and tree regeneration over maintenance of species rich grassland. No changes to strategies required. | | | |
| 5 | Questionnaire | No | Maintenance has already been reduced on many of the open space sites with grass cutting to a minimum and the park areas not having regular tidy ups. | | | | |
| 6 | Questionnaire | Yes | If the land is private with no access to general population then public money should not be used to maintain these sites | Noted. No changes to strategies required. | | | |
| 7 | Questionnaire | Yes | Mowing regimes can be modified/reduced mown paths can be created when these become rougher in character This is a benefit in sustainability terms and perhaps climate change mitigation as the biomass increases | | | | |
| 8 | Steering Group for the Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan | No | The Open Space audit is seriously inflated by inclusion of privately owned rural sites that are not publicly accessible in the list of 'Accessible Natural Greenspace to meet local requirements' (see Q10). Until the audit is corrected it is not possible to say that there are any sites that are not required to meet open space needs. | | | | |



| However members wished to ensure that public access would be maintained into the semi natural areas. They agreed that there could be fewer organised flower beds. |
|---|
|---|



Question 9 - Do you think it would be acceptable to introduce small scale development to some areas of land within larger parks and open spaces if it did not affect the use and enjoyment of the site overall?

affect the use and enjoyment of the site overall? Yes - 45%, No - 22%, Blank - 33% Comment/Response Consultee Yes/No/Blank Action Questionnaire No comment **Questionnaire** Yes No comment Ouestionnaire Yes This would have to be done sensitively in respect to the local Noted. No changes to strategies required. community and the existing habitats Underground car parks. Yes Noted. This measure is considered cost Questionnaire prohibitive. No changes to strategies required. Noted. It is recognised that most large open No once a few houses have been built on part of the land it leaves it Ouestionnaire No wide open for more building. spaces are required to meet local provision standards. Small scale development, where permitted, does not necessarily mean that whole sites will be redeveloped and in any event, every planning application is based upon its own planning merits as part of a plan led system. No changes to strategies required. Questionnaire Very hard to make a general comment..in fact fairly pointless..all of Noted. No changes to strategies required. Ouestionnaire these issues would have to be subject to consultation and planning process In the absence of a water-tight definition of 'small scale development' this Noted. Small scale development, where Steering Group for the Chapel & No question cannot be answered. All that can be stated with certainty is that Hill Chorlton, Maer & Aston and permitted, does not necessarily mean that the land area of any such park/open space would be reduced; it would whole sites will be redeveloped and in any Whitmore Neighbourhood be most unlikely that it could be returned to its original use at a future event, every planning application is based Development Plan time: 'when it's gone – it's gone forever'. Because of the projected upon its own planning merits as part of a plan growth in the population of Newcastle-under-Lyme to 2033 it would be led system. Restrictive covenants are unwise to plan for any reduction in size of the larger parks and open addressed routinely in circumstances where spaces. Further, such spaces may be the subject of endowments or other land is to be used for alternative purposes. conditions regarding their accessibility and use by the population of No changes to strategies required. Newcastle-under-Lyme and these could preclude any such change. Depending on uses and in keeping with the integrity of the recreational Noted. No changes to strategies required. Cleaner, Greener and Safer Yes Communities Scrutiny Committee open space.



| - | Consultee | Yes/No/Blank | Comment/Response | Action |
|---|---------------|--------------|--|--|
| | Questionnaire | | No comment | - |
| 2 | Questionnaire | | No comment | - |
| 3 | Questionnaire | | I think this is a good clear strategy with a positive message in a time of austerity | Noted. No changes to strategies required. |
| 1 | Questionnaire | | No Comment | - |
| 5 | Questionnaire | | I think you will realise from my comments above that building on land around the Westbury Park area would ruin the area for residents now and in the future. Rowley wood and its surrounding area is vital to our health and well being if this were to be built on we would have nowhere to walk without taking to our vehicles which is not acceptable. I understand the need to build more houses but please take into consideration the need for Open Space for people to enjoy, life is very stressful and we need to have areas of calm away from vehicles. People may need houses but we need Open Spaces MORE. | Comment noted. This site is required to meet local standards. No changes to strategies required. |
| 5 | Questionnaire | | Again, we would like you to check your records and use a different classification for land which is inaccessible for public use, land which is privately owned etc | Noted and agreed. |
| 7 | Questionnaire | | An admirable document in many ways.,.could have done with a grammar checker to sort out misused apostrophes and illiterate use of plurals here and there. | |
| | | | I did not see any reference to the idea of a multiuser approach in developing and maintaining tracks and connectivity. OR in this context the VITAL need to work with RoW in Staffs and City of Stoke on Trent whose adjoining 'green connectivities' have often revealed an approach which creates physical barriers to all but walkers. Clearly in these times of increase DDA access needs ,buggy users ,cyclists tri cyclists ,horse riders ,carriage driversthis is unacceptable. Other areas/cities can demonstrate perfectly workable solutions in this respect: it is not worthy of a 21st century strategy to be turning away from proper connectivity and serious offers ref access to open spaces either because partner organisations (SoT) have not been consulted or will not cooperate .RoW network is great in the County and often truncated across NBC boundaries. | intended to cover multi-use. Attention is also drawn to the fact that multi-use can lead to user-type conflicts. This can be dealt with through operational and project planning at the route or site level. No changes to |



Steering Group for the Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan

Cemeteries and churchyards

Cemeteries and churchyards are not mentioned in either of the draft Cemeteries and churchyards are identified as strategies. There is a photograph of Silverdale cemetery in the Open a Green Infrastructure typology in Plan 2 of Space Strategy; only the St John's Wood cemetery is included in the list the Green Infrastructure Strategy. PPG17 of Accessible Natural Greenspace. PPG17 lists cemeteries and has been replaced by Planning Practice churchyards in its list of open space typologies; cemeteries and Guidance. However, the Companion Guide churchyards are also included in Annex A of 'Assessing needs and to PPG17 is still considered a very good opportunities: a companion guide to PPG17' and in Natural England's reference and has been used by the ANGSt Plus assessment framework.

Accessible Natural Greenspace

Accessibility can refer to the ease of access to a place in terms of distance It is accepted that definitions of accessibility and means of transport. This topic is covered in the consultation vary, hence some clarifications have been documents. However, accessibility can also refer to whether or not the included in the Strategy to reflect this public has a right of entry; accessibility in these terms is not considered observation. Sites that are accessible with a in the consultation documents. The result is a huge over-assessment of fee are still regarded as accessible in strategic the borough's quantity of 'Accessible natural greenspace to meet local terms. No distinction is made that all sites standards' (see below). The fact of being able to see something as one travels past it does not make it accessible.

Natural England's publications and guidance on the Accessible Natural Greenspace Standard (ANGSt), on open space/green space and on green We have provided suitable definitions within infrastructure do not provide any explicit definitions; nor does PPG17 provide explicit definitions. However, the implications in these documents are of a public right to enter onto and use the space.

The Forestry Commission provides a clear set of definitions of accessible natural greenspace in its report An analysis of accessible natural greenspace provision in the South East (2007), paras 1.5 to 1.9. These definitions make it clear that accessible natural greenspace is natural greenspace to which the public has a right of access that is not constrained to public rights of way.

The table on the next page lists 33 sites totalling 472.35ha in Chapel and Hill Chorlton, Maer and Aston, and Whitmore parishes that are in private ownership and to which the public has no right of entry. These

consultants. No changes to strategies required.

should be free at the point of entry, although in the clear majority of cases this is so. No changes to strategies required.

the strategy documents about "limited accessible greenspace", "green space accessible via routes and paths" and "open access".



| | | sites should not be included in the list of 'Accessible natural greenspace to meet local standards'. With regard to two of these sites, we note that (I) Maer Hills has two public rights of way, but there is no public right of access to the area as a whole, (2) the Dorothy Clive Garden is owned by a charitable trust and access is on payment of an entry fee. The complete list of 'Accessible natural greenspace to meet local standards' will also include privately owned, non-publicly accessible sites in other parishes of the rural area, but we have not noted them in this response. | |
|---|--|---|--|
| 9 | Cleaner, Greener and Safer Communities Scrutiny Committee | A list of 'Accessible' Natural Greenspace was appended. Whilst recognising that it is difficult to convey complex issues members felt that there is much of significance to members of Borough communities and open space users areas in all areas. We were unable to assess public reaction fully as the results of the public consultation were not available to us at the meeting. Members recommended that there should be a user friendly summary or key points of future change as the authors see them, highlight. Also further opportunities explored for information workshops as the strategies begin to be operational. These could be held for example prior to Council or Public Forum. | the wider consultation exercise. This document is intended to capture the consultation responses and address them as |
| | | Members welcomed partnership working and felt it would be very successful in this context if groups could take over and manage spaces. In response to a member question it was explained that issues concerning fly tipping did not fall under the strategy, similarly sites for travellers as they were an operational issue. Surface water was considered as art of the Green Infrastructure Strategy which would look at open spaces to help ensure that they were more resilient. | Noted. No changes to strategies required. |
| | | Although members were impressed by the high quality of the content and comprehensive nature of the document they were concerned at their accessibility to the general public due to the complexity of the information and size of the document. | hence the level of detail needed. Executive |



| strategies officers confirmed that the consultants who prepared the strategy had been advised to consider other relevant documents such as Rights of Way Improvement Plan (Staffordshire County Council), Rural Green Space Strategy and the Borough Equestrian Strategy. |
|--|
| A member highlighted the decreased maintenance strategy and sought reassurance that the open space remained accessible. This was confirmed where it is feasible to do so, depending on the use of the land. Different approaches could be used such as leasing for pasture, and grazing and mowing regimes could be relaxed (this could allow natural ecosystems to flourish), to enable resources to be moved into the higher priority sites. |



| Consultee | | Comment/Response | Action |
|-----------------------------|---|--|--|
| Aspire Housing Group | A detailed response has been received in relation to Question 10 of the questionnaire | Although we have no detailed comments to make in respect of the proposed visions/strategies, we wish to raise a number of concerns in respect of the lack of due diligence in respect of a number of sites which have been included as part of the assessment of available open space/green infrastructure. In light of the above and other comments within these representations we and our client would welcome the | sites in Aspire ownership that are iden with the Strategies. The details of Aspire ownership and the f |
| Audley Rural Parish Council | | The Parish Council have reflected on the strategies and feel that there are serious shortcomings within the documents. Mainly the Parish Council feels that they do not afford adequate protection of the valuable community assets which are green open space areas within the parish, and within the wider Borough. The Parish Council are disappointed with the lack of foresight within the documents with regards to contribution that these green open spaces should make towards the sustainability of the borough's communities not just today but also in the future. The Parish Council would wish to observe the need within the strategies to protect these sites from unacceptable development by unscrupulous developers encroaching on these open spaces. Additionally there should be more consideration given to the maintenance and access arrangements to a number of existing sites listed within the document. This will encourage better use from the public and will utilise these open spaces, as currently there some which are totally inaccessible to the public and are therefore not able to be used to their full potential. | significantly towards sustainability especthrough the provision of ecosystem service. The comments and concerns regarding development are not uniquely local. Development guidance is determined that he NPPF and Planning Practice Guidance Policies for development management a strategic matters for the new Joint Local We do not believe that the draft Strateglack foresight; indeed they are considered be both practical and ambitious, designed provide suitable amounts of high quality |



| | circumstances when local authority spending is under severe pressure. Management and maintainence is ultimately an operational issue. These issues combine to pose tough choices to the Borough Council and other providers including Parish Councils as they attempt to provide high quality sites for open space, that may be suitably maintained to standards that are as high as possible with whatever budgets it may have available in future years. No changes to strategies required. |
|------------------|--|
| Highways England | Highways England notes that the Open Space Strategy sets out how the Council intends to manage its open space and to ensure that the needs of the community are met in the most appropriate way. It includes an audit of all open space within the Borough including parks, play space and allotments, and includes details of the Council's vision for ensuring accessibility, management and the role of developer contributions over the plan period. Highways England considered that the Strategy will have no impacts on the operation of the SRN. Highways England notes that the Green Infrastructure Strategy defines how 'green infrastructure' will be planned for and delivered within the Borough. In relation to transport, the draft document states that creating new and managing Green Infrastructure can help the Borough manage climate impacts, by seeking Nature Based Solutions over grey infrastructure solutions, and highlights the connection between transport and green infrastructure. Highways England does not considered that the Strategy will have any impacts on the safe operation and efficiency of the SRN. Highways England has no further comments to provide and trusts that |



| I., | T | Ta. | T |
|---|--|--|---|
| Keele Parish – Neighbourhood Management Plan Group | N.B. These comments are to be read in conjunction with the attached Maps I-3 | Map I Shows current distribution of green space and woodland in and around the Parish. Yellow dashed line shows area already protected by formal conservation areas. Note golf driving range and new cemetery provide additional green space that may be expected to be permanent and is outside conservation areas. | The Parish Council comments are noted. They relate to the Neighbourhood Development Plan, which must comply with the strategic aims of the development plan and which will be considered by an independent examiner appointed by the Borough Council at the appropriate stage. No changes to strategies required. |
| | | Map 2 Shows areas of woodland covered by a degree of protection (Natural England "Ancient woodland" and "Deciduous woodland priority habitat" designations. Notice the very patchy nature of these designations, reflecting very precisely the existing patterns of woodland cover, and including most of the newly established plantations in the Golf Course area. | Noted. No changes to strategies required. |
| | | Map 3 As previous, but includes areas covered by Econet and Priority Habitat Network designations. Conservation practice recognises the need to provide joined up ecological networks to counteract environmental fragmentation owing to development and pressure brought about by climate change. | The role of ecological networks and landscape is acknowledged and is reflected in the Green Infrastructure Strategy. No changes to strategies required. |
| | | The high priority woodland habitat network has the effect of joining together and consolidating existing English Nature habitat designations. My view is that the Parish Council and University should regard the existing designation areas + the high priority habitat network (i.e. everything in green on this map) as a basic template within which new development should be only allowed in highly controlled circumstances. It obviously can't be a "no development" zone as it covers much of the University. Where these areas are not already developed (i.e. in marginal areas of the campus and the golf course site) there should be a presumption against development and in favour of opening as public accessible open space. | |



| | In addition to the provision of ecological habitat corridors these woodland areas serve three functions: They provide the visual backdrop and framework for Newcastle town centre, and form the terminating point for wider landscape views, both of the historic core of Keele village from the SW and the wider view of the whole North Staffordshire landscape (e.g. from Bar Hill). They provide recreational open space for inhabitants of Keele, Silverdale and the Westlands. They provide the green and rural setting that is a prized feature of the recruitment proposition made to students and staff at the University (and which is highly valued by the students). | Noted. No changes to strategies required. |
|----------------------------|--|---|
| Loggerheads Parish Council | When discussing Open Space Strategy we must first refer to NPPF and in particular paragraph 73 which reads: Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required. | They have been reviewed by Council Officers and the consultancy team. Any changes, where required, have been made to both startegies, Action Plans and summaries. |
| | With this policy in mind the Parish Council firmly believes that it is inappropriate to separate the Playing Pitch Strategy from this consultation. Sport England may well set the standard for playing pitches but this comes after the allocation of space. Indeed, Fields In Trust (FIT) "beyond the 6 Acre Standard" clearly shows that Playing Pitches should be a significant proportion of the Open Space available to a community. Accordingly, it is only right that Playing Pitches should be part of this Open Space Strategy. | Strategy (PPS) which follows Sport England guidance. The PPS was considered during the preparation of the relevant strategies. Hence, no further changes to the strategies is required. |



With regard to the local community wellbeing, it is interesting to note that National Government has recently released a new policy called: **Sporting Future: A New Strategy for an Active Nation.**

Within this document the role of local government is referred to as follows:

"Local authorities have, and will continue to have, an absolutely crucial role to play in delivering sport and physical activity opportunities".

The document goes on to add:

"Local Health and Wellbeing Strategies have highlighted physical inactivity as an issue that needs to be tackled and agreed approaches to tackling it. Local authorities also have responsibility for wider policy areas which can have a significant impact on the physical activity of the local population".

Beyond Playing Pitches, significant emphasis is put on play for the younger generations and clear guidance is given for Equipped/Designated Play Space.

How does this affect Loggerheads?

Over the last 30 years Open Space in the Loggerheads Area has been completely overlooked as the emphasis on increased housing stock has been all consuming. It is now appropriate to put things right; however, yet again, Loggerheads has been overlooked and does not appear on the Newcastle-under-Lyme Open Space Strategy Action Plan. Indeed, some of the information regarding Loggerheads is wrong, for example, within Amenity Green Space, the Rowney Close playing field no longer exists as it is now occupied by Aspire Housing. In addition, recent new developments have included Local Area for Play (LAP) and Local Equipped Area for Play (LEAP) but completely overlooked the size of the local community which is quickly approaching 1500 dwellings. At this



point we should be planning, according to FIT Standards, where the 3rd Multi Use Games Area (MUGA) will be located where in reality non currently exist.

From a Health and Well-Being perspective: Loggerheads currently has one football pitch, located in Burntwood, and no other sporting facilities available outside school hours. According to NULBC Playing Pitch Strategy (PPS) this pitch is, "standard quality adult pitch with minimal spare capacity. Pitch is minimum size and is not serviced by changing rooms". This statement is wrong. The pitch measures 93 yards by 60 yards. The FA dictates that a pitch must be between 100 and 120 yards long, for this reason the local team has to play home matches at Eccleshall football club because the Burntwood pitch does not comply with the FA minimum standard; this hardly encourages an active community. In addition, parents are reticent to allow young children to play on the pitch as it is remote, in local woods. Because of this remoteness it is not unusual to find used syringes around the pitch. With regard to comments in PPS to spare capacity a minimum sized FA standard pitch needs 6100sq yds to be viable or 1.26 acres. The total space available in the Burntwood site is 7211sq yards or 1.49 acres, this hardly constitutes spare capacity.

It is worth noting that, even in the Newcastle Great Outdoors Survey, people believe there is a significant shortfall in outdoor sport pitches. Meanwhile your consultation document states that "research has also shown that the quality of open space in the Borough is generally good or very good" which is, at best, misleading. At worst it might suggest that not all areas within the Boroughs responsibility have been properly surveyed. By virtue of its rural location Loggerheads will always have, what appears to be, an abundance of Open Space; however the vast majority of this is farm land which is not always safe to use. In addition, there is the Burntwood, which is Forestry Commission and Public access is only permitted and can be restricted and refused at any time. Loggerheads is now desperate for, both recreational and play facilities that are appropriate for a population that will soon exceed 3000.



For the future, the Borough focus on open space must broaden to fully include the rural areas if they are going to improve the Health and Well-Being of Communities and achieve the standards laid out in NPPF para 73

Specific comments:

Draft Open Space Strategy

The Parish Council supports the strategies.

Image 6 is of allotments at Loggerheads (but they don't appear on spreadsheet?)

They have been reviewed by Council Officers and the consultancy team. Any changes,

Image 9, accessible woodland is of high recreational value and important for biodiversity (photo is Burntwood but doesn't acknowledge this location) where required, have been made to both startegies, Action Plans and summaries.

Section 5.7 The quantity of natural and semi-natural green space is greatly in excess of the standard;

however, this quantity needs further interpretation. The majority of this open space type is not in

Council ownership and hence subject to many variables especially in terms of access. Furthermore,

some areas of natural and semi natural greenspace are subject to nature or economic management

(e.g. woodland). In view of the importance now being given to Green Infrastructure it is the case

that having a large area of natural and semi-natural green space is a strong-positive in terms of

providing ecosystem services to the local population. We are concerned that "average" is misleading as includes significant proportion of land that is not accessible.

Green infrastructure strategy

Parish Council supports the objectives and agrees with the interventions for node 1.

Plan 2 of "Needs Met" wouldn't show so much blue (90-100%) in east if didn't include the private non accessible land.

Spreadsheet Children and young people facilities

496 where is Heathgrove woodland? This is not "Provision for Children and Young People", in fact we have been actively discouraging young

The Parish Council comments are noted. They have been reviewed by Council Officers and the consultancy team. Any changes, where required, have been made to both startegies, Action Plans and summaries.



| Resident | people due to inaccessibility leading to anti-social behaviour including fire setting. 505 Tadgedale Brook and 509 Bell Orchard are named on the list but not the play areas at Knighton or Almington, these should be included. Amenity greenspace , green corridors and allotments spreadsheet 431 Rowney Close playing field was built on this year by Aspire housing. Heading on consultation page of website includes the word "allotments" but Loggerheads not included or any allotments? Appendix headed "Accessible natural green space required to meet local standards" Is misleading as includes 254 hectares in Loggerheads parish alone that is not accessible , ie it is private ownership with no public right of access or permissive access. Site 327 is not in Loggerheads. Sites 372, 373, 374, 379-384, 387,397,441-444,446-450,452-453= 254 hectares that is NOT accessible. Strategy Open space action plan spreadsheet The Parish Council is disappointed that there are no actions to improve for Loggerheads (or rural area). I have just filled in your survey with regard to Open Spaces and am Comment noted. Rowley Wood is required |
|----------|---|
| | concerned about the possibility that the land around Rowley Wood and including Rowley Wood maybe looked at for building again. I have attached 'protest statement' which was read out to the Council Cabinet at a Council Meeting in January 2015 whereby local residents who were then concerned about our local area. Could you please take this into consideration when reviewing any ongoing building schemes in our area. As you will see an on-line petition which only ran for just over a week already had over 1900 signatures. Good Evening Council We refer to the Call for Sites List, Asset No 0292/920/002 On behalf of the concerned residents of Westbury Park we wish to register our strong objection to the proposed sale and possible |



development of land adjacent to Westbury Park, an area known locally as Bunny Hill. We understand that our objection can be raised and documented in the Cabinet Meeting tonight.

The land at Westbury Park is both listed as Green Belt and is included in the Green Space Strategy and any possible development on it cannot be allowed to proceed for numerous reasons.

Westbury Park is already an extremely built up area and we need to retain these green areas for people to get outdoors for exercise and their general well being. Families are more likely to do this if there are local green areas within walking distance from their own homes, children need open spaces to enable them to develop imagination and creativity, building dens, and interact with the natural environment, to develop this land would remove the opportunity for local children to enjoy the social benefits of open green spaces. The more time people spend outdoors the less stressed they feel — an important consideration given the cost to the UK economy of depression and mental illness.

The roads around this area are already congested and if this land were to be built upon the already gridlocked roads would not take the strain. Roe Lane and Clayton Road at peak times have 'bumper to bumper' traffic and when there is a problem on the M6 which is quite often, it then becomes ten times worse, imagine if we were to add yet more traffic from a new development the additional traffic would cause utter chaos to the already over crowed roads around Clayton and the Westlands. The local Schools would also not cope with any extra pupils, Seabridge, Langdale and Clayton Language and Business College would struggle to accommodate children from a new development.

Over the last few years, Council have been spending to improve this green space with the introduction of 'shrub planting' which is now quite mature giving even more habitat to the already extensive list of varied wildlife which have made their homes on this land including the protected Great Crested Newt. More recently, in Rowley wood and woodland nearby the removal of rhododendrons has been a major project allowing native plants and trees to thrive in this area. Surely, given the money





| | management regimes. However the Borough Council would emphasise that any development within Stafford Borough to deliver interventions, as suggested through intervention f (copied below), will need to meet policies in the adopted Plan for Stafford Borough and the development strategy approach. "f. Over development of this node should be resisted although 'key hole' and 'minor development' could release resources for interventions listed above. New development should be screened wherever possible by trees. Infractructure Strategy and accept that the strategy, which will be an evidenced based document, will inform the new Local Plan for Newcastle under Lyme, including relevant statutory policies related to Green Infrastructure. We would further comment that Stafford Borough already has a statutory Local Plan (adopted 19/06/14) which presently informs development in those parts of this area (Bishops Wood – River Lea). Therefore, we intend that the drafting of the new plan for Newcastle under Lyme will address the aims of Stafford Borough Council's plan to ensure that there are no contradictions in planning policy that affect the strategic Green Infrastructure connection across administrative boundaries. | , , |
|------------------------------|--|-----|
| | Through on-going Duty to Co-operate collaboration Stafford Borough Council would welcome further discussions concerning areas bordering Newcastle-under-Lyme and Stafford Borough, in particular the Shropshire Union canal (G6 on page 29) together with N1 and N5. In addition it should be noted that Stafford Borough Council own and manage the Ferndown LNR, the northern boundary of which is with Newcastle Borough Council. As the Council are providing open space for residents at this location it would be helpful to be involved in any future plans of this locality. Newcastle Under Lyme Borough Council would welcome further discussions with Stafford Borough Council on connective Green Infrastructure across respective boundaries for the quoted projects and others that are or may be linked. This is considered to accord with the aims of the relevant strategy which promotes both protection of important, strategic Green Infrastructure as well as partnership working and collaboration to achieve mutually beneficial objectives. | |
| Staffordshire County Council | Ecology response: These strategies are welcomed. I have one or two comments: Draft Open Space Strategy 5.20 states: "In circumstances where there are clear surpluses in open space provision, in terms of quantity relative to location and/or typology, along these general lines. | |



it may be appropriate to consider reallocation of land for the provision of new development, in whole or in part." It is recommended that this statement be caveated as being subject to the application of Local Plan policies for protection of the natural and historic environment, the maintenance of coherent and connected Green Infrastructure, and ecosystems services provision. **Draft Green Infrastructure Strategy** s.2.4 refers to the ecology of the Borough. It could refer to the fact that Noted and agreed. Change made. the Meres and Mosses Nature Improvement Area includes part of the Borough see http://www.themeresandmosses.co.uk/. This should be reflected in Node descriptions in s.5.0. The Borough supports significant populations of protected species including great crested newts and dormouse - creating and connecting habitat for this species should be a priority as it is for the State of Staffordshire report. Biodiversity Opportunity Mapping has been carried out for the Borough – this could be referenced.

s. 2.4 refers to the impacts of Hs2 Phase 2a. As well as green bridges a Noted and agreed. No changes to strategies significant means of addressing impacts will be creation of new habitats required. (close to or away from the route) and enhancement of retained habitat such as by introduction of appropriate management to neglected woodlands.

s.4.5 - Plan Green Infrastructure at different scales – the "How" section | Noted and agreed, Change made. could refer to working with conservation organisations and with Parish Councils and community groups -key potential green space managers as well as users.

Deliver through partnership – the "How" section could refer to the LEP. | Agreed, as this may also facilitate additional

sources of funding, including the LEP. Change made.

N5 – there is considerable potential for enhancing ecological connectivity Agreed. N5 has been amended to reflect in this area by woodland planting connecting existing fragmented ancient these points.



| | woodlands. HS2 will have a significant effect on Swynnerton woodlands and landscape which will require mitigation but also brings opportunities for enhancement of connectivity and for woodland restoration. T4 – Offsetting – could refer to the Defra system. | Noted. We have made reference to DEFRA/Natural England pilots in circumstances where biodiversity offsetting is an option for developers under the planning system's mitigation hierarchy. |
|--|---|--|
| | T9 Biodiversity & Geodiversity – I note that you refer later in the strategy to obtaining advice from the County Council where there is concern about the detrimental impact of a given development but that you do not suggest obtaining specialist advice for biodiversity and geodiversity. This seems to be an inconsistent approach. | strategy to address County Council concerns. We refer repeatedly to the need |
| | TIO Trees – reference could be made to the ecosystems services provided by trees as measured by the i-Tree process. | Agreed. Amendment made. Evaluation measures other than i-Tree are available. I-Tree Europe is being launched in 2017. |
| | TII National and regional infrastructure – priorities for HS2 should include maintenance of ecological connectivity throughout the route and | |



| securing compensatory habitat creation and maintenance as well as planting to address landscape impacts. | challenging to secure. Accordingly, we have included partnership working, including the LEP as a means of exerting influence in this regard. |
|--|--|
| Section 6: Delivery and the role of the Borough Council The role of the Borough Council: there is considerable potential for the Borough Council to work with conservation bodies, Parish Councils and other local bodies as well as with other local authorities. | |
| A Borough Council role could also be to encourage and develop the role of green infrastructure in delivering ecosystem services and health benefits. | Noted. Change made. |
| Landscape response: | |
| Page 11 2.3, 2.4 Landscape Character and Ecology: | |
| Under Ecology the likely effect of HS2 on the Borough's ecological networks is mentioned. HS2 will also have an effect on landscape character. In addition to the direct landscape and visual effects of the route, indirect effects on farm management as a result of field severance may in turn affect landscape condition and character. | requirement of HS2 as a national infrastructure project, to address |
| 2.8 The statement that maintaining field boundaries in good condition is important to landscape is strongly supported. | Noted and agreed. |
| Section 5 Strategy Focusing on the Nodes, I have the following observations that relate the Nodes to Landscape character descriptions and supporting evidence from Planning for Landscape Change: | |
| Table 7 NI- The strength of landscape character is supported by the Staffordshire Landscape Character Assessment. Extrapolating from Plan | Noted. No changes to strategies required. |



4, according to Planning for Landscape Change NI falls within the 'Woodland Quarter' in the character type Sandstone hills and Heaths. Most of the area falls in the Farmlands subtype, though the area south of Loggerheads falls in the Estatelands subtype, and around the Maer Hills within the Forest subtype. North east of Maer Hills the character type is Ancient Redlands. Much of the area had policy objectives of Active Landscape Conservation and Landscape Maintenance and areas south of Loggerheads and around Maer and the Maer Hills were indicated as of highest sensitivity. The strategy of conservation and protection are therefore supported.

The draft Landscape Character Review for Staffordshire proposes a Noted. We have extended the description to typology where most of NI falls within a new character type Wooded state that this area is urban fringe hills and Farmlands, the exception is at the northern end, east of Aston, interspersed with settlements straddling a where the character type is Ancient Redlands, but this is a landscape with number of landscape character types. a strong woodland influence.

An emphasis on protecting the wooded landscape and enhancing Noted and agreed. No changes to strategies woodland connectivity are appropriate to local character. All points of required. the strategy are strongly supported to simultaneously protect and enhance the landscape.

N2 Newcastle West Green Gateway is described as urban fringe Noted. No changes to strategies required. interspersed with settlements. According to Planning for Landscape Change this area straddles a number of character types: working south to north Ancient Redlands (farmland) (Staffordshire Plain) Ancient Slope and Valley Farmlands (Potteries and Churnet valley), to the north of Silverdale an area of Coalfield Farmlands, and southwest of Audley, Ancient Clay Farmlands.

The draft Landscape Character Review for Staffordshire identifies an area to the south of Silverdale as Ancient Redlands and majority of the rest of the area Coalfield Farmlands, which relates well to the description in Table 7.

N3 Planning for Landscape Change indicates the character type as Ancient Noted and agreed. No changes to strategies Clay Farmlands across this node. Active Landscape Conservation was required.



the policy objective derived for the area around and to the west of Betley, which indicated a landscape with characteristic features strongly represented and in good condition. The new typology indicates Settled farmland around and to the west of Betley and Ancient Clay Farmland to the east. The strategy of conservation and protection is appropriate, along with management to encourage enhancement.

N4 Planning for Landscape Change described this area as falling within Noted and agreed. No changes to strategies Ancient Slope and Valley Farmlands. The draft new typology describes it required. as Coalfield Farmlands, which better reflects the predominant character of this urban fringe landscape. The strategy of promoting landscape improvements and new planting as part of green infrastructure is supported to mitigate for the strong influence of urban development.

N5 Planning for Landscape Change Ancient Redlands to the north east, Noted and agreed. No changes to strategies Sandstone Hills and Heaths, south east from Swynnerton Settled required. Farmlands Draft to the north Ancient Redlands, central Wooded Hills and Farmlands, south east from Swynnerton Settled Farmlands. Conservation and protection is supported, particularly across the central swathe around Swynnerton Park, which is indicated in Planning for Landscape Change as of highest sensitivity.

Unfortunately I have not received comments regarding historic environment.

I have received comments from the Rights of Way Team:

Rights of Way comments:

We have recently published the 4th Review of the Definitive Map and Noted. We have strengthened the strategies Statement for Newcastle Borough and the Borough Council have been with the comments and observations made. provided with copies of the maps and Statement to indicate the alignment of all recorded routes. We expect the planning authority to ensure that all public rights of way are protected and, where possible, enhanced in conjunction with any development. If any Public Path Orders



| Silverdale Parish Council | are required to enable the development to take place these should be processed alongside the planning application by the District Council. The proposals to enhance the existing path network and seek to create off road access in certain areas is welcomed. NBC should also be aware that there will also be non-definitive routes across certain sites which should be considered in any development/enhancement proposals. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question. The Strategy proposes the creation of new footpaths, bridleways and cycle routes but does not say how this will be done. Applicants should be encouraged to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include: - the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists across Staffordshire where there is currently a shortfall in available access routes. We have had a long term aspiration to upgrade some of the footpaths within Bathpool Park to formalise the usage by horse riders and cyclists and this is something NBC previously agreed to although it has not formally progressed. We feel that this should be a key aspiration of the Plan(s). - the creation and promotion of short circular walks to promote the health benefits of walking - the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture The County Council is able to provide further advice and guidance as and when required. In general the P |
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| | documents. In particular, the suggestions of improving the quality of green spaces throughout the Parish and an improvement in the ratio for Allotment acreage to people. |



However, Silverdale Parish Council would welcome a serious and Comments are noted and may be addressed significant discussion in the Green Infrastructure report about the through the Local Plan consultation process. dangers of increasing several encroachments into the Newcastle under Lyme Green Belt. See below our misgivings in relation to the future of Keele Golf course.

We would wish to work in partnership with the Borough to increase the As above. safety and security of residents using the many modes of amenity space.

Open Space Action Plans

Keele Golf course (Municipal Golf course suggesting a Masterplan was Comments are noted. Opportunities to required for 'scope for new housing development within large urban discuss points of detail about town planning biodiverse setting'. The Parish council would welcome proposals to ensure a future for the previous golf course bearing in mind the location consultation process. The detail of proposed within the Green Belt. We understood a report has been produced by Peter Brett Associates. We would like to have sight of their report.

will be made available through the Local Plan development that may or may not happen is outwith the scope of the Green Infrastructure and Open Space strategies.

Second, a major housing development (how many houses are likely; 700, As above. 800?) even phased over ten or more years would be on such a scale would ensure a detrimental impact on Silverdale Parish residents and the services within the parish. The housing development arising from the regeneration of the former coalmine and industrial providing 300 homes in Silverdale Heritage Park is much smaller and this was completed in 2014. Silverdale Parish Council should have had the space to form a fully integrated community when an even more substantive scheme is being promulgated.

The third point is that we understood there were proposals for geothermal energy technology, following testing by Tesla Exploration from Noted. The information will be held by the 21 January to 25 February by across the golf course. Are these Company and may be commercial in investigations finalised? What is now known about energy from water sources underground?

confidence.

Noted.



| | The assets listed under Allotments by size and quality score in the | |
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| | borough affected by the new policy framework do not include the residual element of Acre Allotments. | |
| | This residual site has been fly tipped and appeared insecure as shown in the photograph below; taken in August 2016. The Parish Council would welcome proposals to ensure a future use in the medium term consistent with the uses of the neighbouring Allotments and strong security in the short term to deter and prevent further fly tipping. | |
| Thistleberry Residents Association | A strategy plan is always welcomed provided that it is not used to do what Officers, paid and elected, want rather than what the community wants. The problem seems to be that with open spaces that if there is money available to spend these spaces become filled with stuff that is not wanted or is not necessary and sometimes this is measured by the amount of vandalism that then takes place. | Borough Council will advise the new joint Local Plan, which is under preparation. Concerns raised about use and maintenance |
| | Some green spaces are more amenable to certain activities than others. It is important then not to impose the same stamp on all open and green spaces. Some are more suited to being left empty to enjoy as an open space – even just to look at and this should not be downgraded to mean lack of use or redundancy. Green and open spaces should not be subjected to 'fashion'. They can have their own identity which would help in them being attractive to different needs. (2.7) | multifictional and other serve a more restricted or limited purpose. However, We re-iterate that maintenance budgets will inevitably force the Council to take some |
| | It is important that quality is regarded to be more important than quantity. It is also important that people are not misled into having things installed in green and open spaces that are not necessary and somehow detract from it being an open and green space. Thus good and accurate communication is important also unbiased surveys. As people's lives become more stressful they are looking for peace and tranquillity – even children want this. A neglected green space can be as detrimental as a derelict building – the Queen's Gardens at Pool Dam is an example. | |
| | Thus quality is not just about winning awards but the benefits that well managed sites bring to well-being. This is particularly important if green spaces are to be 'used' as a tourist draw. Their management should not | |



be a two- minute wonder but a systematic and regular housekeeping. (5.2)

It is noticeable that 72 out of 104 sites scored 70 or less in one of the Section 106 monies are normally directed recommended standard/criteria. Given the amount of \$106 monies that must have been contributed from developers this could be regarded as sites is usually subject to monies derived failing? (5.4)

towards new sites. Maintenance of existing from maintenance budgets.

Play equipment needs to be more imaginative and made from natural Comments are noted. No changes to materials to blend in with the natural contours and ecology of the space. strategies required. For example, the Parkway might be able to accommodate a treewalkway. Large boulders and logs could stand in place of climbing frames etc..

Usage is not always the best test of a green open space. Sometimes just Comments noted and accepted. No changes looking at a green space whilst passing by etc. can give as much pleasure to strategies required. as anything else and this should not be construed as a luxury.

There should not be an overuse of route maps. These might be Comments are noted. No changes to necessary for some open spaces which are large. The purpose of some strategies required. paths is for exploration and discovery (5.10) and not all parks and routeways are suitable for young children (in pushchairs) or for wheel chairs. This should be a factor in the diversity of sites and spaces (5.11) and bio-diversity is as important as any other kind of diversity (5.12). Some green spaces should be seen as 'challenging' (5.14)

A lack of good management or cutting back on good quality management | Comments are noted. No changes to should not be excused in terms of it being a good thing for ecology - strategies required. Plants and trees etc need to be cut sometimes it isn't. back/pruned/managed, often on an annual basis, in order to stimulate growth and to encourage development and health of the plant.

The issue of 'underperforming' open and green spaces (5.22) and how The strategies have addressed which sites are these are perceived and dealt with gives cause for concern as it could be needed to meet local standards. No changes all too easy to build on a green space particularly if it is in a desirable to strategies required. location (see above points on empty spaces and their usefulness) (5.22).



CIL should not be provided to LAs to do with as they please. There Comments are noted. At this stage, CIL is needs to be real and proper consultation in order to agree how the being considered but nothing has been agreed money is to be used (see above point on this issue re which projects are in any level of detail. to be implemented). It is, after all, a Community levy with the emphasis on Community (5.24). We would like to know what the guidelines might be for CIL.

The subtle reference to 'space' having to be used 'for' something is also Noted. The strategies have focussed upon a dangerous suggestion. Leading to the erroneous perception that if it is the need to provide open space to benefit not 'used' it is somehow superfluous (see above points on this). This is local communities and how it is connected important particularly if spaces are placed in the hands of private or entrepreneurial agencies (5.39).

and the benefits thereby derived. The development and other use of land will be shaped through the new Local Plan, which is a separate process.

It is appreciated that the NBC is aware that decisions made are Comments noted. No changes to strategies reversible. However, this should not be interpreted as being able to do required. anything which might be detrimental since it can be reversed. Some things 'broken' can't be 'fixed'.

Using volunteers is a good idea, but relying on volunteers to carry out Agreed. The Borough Council is also aware the concurrent functions of the NBC is a risky strategy and not a solution to any NBC funding/staff shortfalls (5.44).

that the use of volunteers is only one way to maintain sites.

Britain in Bloom is a good idea and demonstrates what can be done and Comments are noted. Britain in Bloom is self how planting etc. can be used to improve a place/space. However, what | funding and outwith the scope of Council Britain in Bloom does point up is that, as a result, other areas and other maintenance budgets. The Council continues activities are sometimes neglected in order either to pay for it, or when to assess its budgets and priorities and will simply compared. The town centre should not be the only concern of use both strategies to inform its decision the NBC and its activity. The town centre is only one small part of the making processes. borough (5.46).

Events in green spaces are not a bad idea but some spaces lend Comments are noted. In addition, the ability themselves to this more than others. Bands in parks or singing in the for events to be organised and held is not park or Sunday in the park could be a feature on dry weekends/evenings. just the responsibility or prerogative of the



| Whitmore Parish Council WPC - The Parish Council wanted me to ask a question in relation to the above consultation. We have a query regarding 'Green Spaces'. Can you confirm that the green spaces included in the document (assessment 1746.22ha) are all freely accessible to the public? NULBC response - I can confirm that the publicly owned land will be accessible to the public, the privately owned land may have limitations to its accessibility. WPC - However, I would be grateful if it could be noted that comment has been made to the Parish Council that the Borough Council has not clearly defined, in its consultation document, exactly what it means by the description ' Accessible natural green space.' For reference, we understand that the Forestry Commission defines it as being 'natural green space to which the public has a right of access that is not constrained to public rights of way' and certainly this seems to be the widespread understanding by the general public, of the description. However it has been suggested that the Consultation lists of number of sites within the Borough which are privately owned green spaces which are NOT accessible to the general public, in particular 472. 35 ha in Chapel and Hill Chorlton, Maer and Whitmore Parishes - for example, to name but a few sites - numbers 550/327/401/445/362/385/483/552. Could you comment, please and in particular, confirm the precise wording of the definition of 'accessible natural green space' which has been adopted by the Borough Council? | The definitions uments cover including ", "green space |
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Date: 1st March 2017 Revisions: Final