



Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan

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Landscape and Community Manager
Newcastle-under-Lyme Borough Council
Merrial Street
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By email to: landscape@newcastle-staffs.gov.uk

Dear Sir/Madam

Draft Open Space Strategy and Draft Green Infrastructure Strategy Public Consultation

I attach the formal response by the Steering Group for the Chapel & Hill Chorlton, Maer & Aston and Whitmore Neighbourhood Development Plan to the above Public Consultation.

Yours faithfully

Richard Oppenheimer
Chairman
Steering Group

Cc Whitmore Parish Council, Maer Parish Council, Chapel and Hill Chorlton Parish Council
Borough Councillors David Loades, Paul Northcott, Barry Panter

Q1 Do you/or do you not support the ‘Vision for Open Space’ as set out in Open Space Strategy (Page 12, Open Space Strategy). If not how would you change it?

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. This is in direct conflict with the aspiration expressed in the final sentence of the vision.

Q2 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?

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.

Q3 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)?

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. 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 S106 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.

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.***

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.

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.

Para. 5.12 Diversity of provision does need to be made for people with hobbies and special interests; however, while some such needs could be met through 'duty to co-operate', distance and transport must always be considered, remembering the 22% of households that have no car or van and the 20.0% of the population that have poor health (which may not necessarily prevent them from having a hobby or special interest).

p. 21 The reference to 'housing led growth' is concerning – development should be plan led.

Paras 5.29 to 5.32 proposed financing of upkeep of new open spaces through private maintenance agreements. The implications of such arrangements need to be fully understood by the residents of developments and by the public at large. Are open spaces that are financed in this way truly Public Open Space, freely accessible to all comers? Or is accessibility limited to the residents of the specific development, i.e. those people who are contributing financially towards the maintenance of the open space? ***If new Public Open Space is to be financed via private maintenance agreements as a matter of course, then it will be essential to adopt and publicise policies that enable the status of such Public Open Space to be clearly understood by the general public.*** (See further comment under Q10.)

Para. 5.31: 'regular independent inspections must be undertaken to ensure standards are being maintained ... Independent organisations undertaking and monitoring maintenance must provide evidence of their maintenance works/inspection regime to the organisation responsible for organising maintenance.' This raises questions fundamental to the neoliberal privatisation of public works and services: Who sets the standards? Who will inspect the inspectors? Where will the ultimate responsibility lie (Where will the buck stop?)? Or, will nobody be responsible?

Q4 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?

NO

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.

Q5 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?

NO and yes

The Spatial Strategy omits significant parts of the rural area that make important contributions to the borough’s Green Infrastructure and are well endowed with PRow and minor country lanes suitable for walking. For example, the strategy omits the whole of Chapel and Hill Chorlton Parish, the south-eastern and north-western parts of Maer Parish, and western extremities of the rural south-west. Green infrastructure in these areas includes woodlands, wetlands, and significant areas of peatland, and wildlife corridors via watercourses, hedgerows, tracks, and 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.

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. Table 3 also considers the challenge and opportunity of ‘Improving the Green Infrastructure network and its connectivity’. The network and 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.

N2 and G3: Yes. We support the strategy to make use of the disused 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.

Q6 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 and NO

T1: No. See caveats above.

T2: Yes.

T3: Yes.

T4: No. Any loss of green infrastructure should be very strongly resisted. If a green space is poorly performing, the question why should be asked and remedies sought; if it is thought to be surplus to requirements, future need should be considered; if it is thought to be ‘in the wrong place’, the green space, its use and its surrounding area need to be studied – perceived wrongness of place might be remediable by making changes in the surrounding area, with no loss of the green space.

T5: Yes.

T6: Yes. But urban food production can never substitute for food production in the rural setting. Consider establishing an urban/community farm. Can a suitable site be found in a location such as Silverdale or Chesterton? See Heeley City Farm in Sheffield, <https://www.heeleyfarm.org.uk/>. Such ventures have educational, social and health and wellbeing benefits, and can have aspiration/career benefits for young people.

T7: No. This theme presents something of a mixed message and conflicts with other messages in the Open Space and Green Infrastructure 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’.

T8: Yes. But adequate provision (quantity) of locally accessible open space will be required for such a programme. Participation by the people who would derive most benefit from such programmes is most likely to be achieved when the offer is close to home.

T9: Yes.

T10: Yes.

T11: Yes. The Borough Council should go further than is suggested and (a) seek partnerships with the responsible bodies and (b) participate fully 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 Council’s landscape assessments. These have on occasion resulted in 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.

Q7 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.

Exclude site 409, reference 421, A51 roadside verge, Maer, 'amenity greenspace'. The assessment of this unmaintained verge on a busy primary route with a nominal speed limit of 50mph as 'Amenity greenspace required to meet local standards' is beyond comprehension. 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.

Q8 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?

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.

Q9 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?

NO

In the absence of a water-tight definition of 'small scale development' this question cannot be answered. All that can be stated with certainty is that the land area of any such park/open space would be reduced; it would be most unlikely that it could be returned to its original use at a future time: 'when it's gone – it's gone forever'. Because of the projected growth in the population of Newcastle-under-Lyme to 2033 it would be unwise to plan for any reduction in size of the larger parks and open spaces. Further, such spaces may be the subject of endowments or other conditions regarding their accessibility and use by the population of Newcastle-under-Lyme and these could preclude any such change.

Q10 If there are any other points you would like to make about the draft documents, or related to Open Space or Green Infrastructure then please make them here.

Cemeteries and churchyards

Cemeteries and churchyards are not mentioned in either of the draft strategies. There is a photograph of Silverdale cemetery in the Open Space Strategy; only the St John's Wood cemetery is included in the list of Accessible Natural Greenspace. PPG17 lists cemeteries and churchyards in its list of open space typologies; cemeteries and churchyards are also included in Annex A of 'Assessing needs and opportunities: a companion guide to PPG17' and in Natural England's ANGSt Plus assessment framework.

Accessible Natural Greenspace

Accessibility can refer to the ease of access to a place in terms of distance and means of transport. This topic is covered in the consultation documents. However, accessibility can also refer to whether or not the public has a right of entry; accessibility in these terms is not considered in the consultation documents. The result is a huge over-assessment of the borough's quantity of 'Accessible natural greenspace to meet local 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 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 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 (1) 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.

(See next page)

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Public Consultation, November–December 2016

Response from Chapel and Hill Chorlton, Maer and Aston, and Whitmore Parishes Neighbourhood Development Plan Steering Group

Accessible natural greenspace							
Site No.	Reference	Name		Parish	PPG17 classification (primary purpose) - OS Typology	Area (Ha)	Overall % Quality Score
550	1095	Chorlton Moss		Chapel and Hill Chorlton	Accessible natural greenspace	10.56	70
1 site					Subtotal	10.56	
327	1	Maer Hall		Maer	Accessible Natural Greenspace	82.34	
374	126	Willoughbridge Bogs		Maer	Accessible Natural Greenspace	8.15	74
398	385	Berry Hill		Maer	Accessible Natural Greenspace	9.14	
399	386	The Bogs		Maer	Accessible Natural Greenspace	8.31	73
401	389	War Hill		Maer	Accessible Natural Greenspace	9.24	
402	390	Red Hill		Maer	Accessible Natural Greenspace	11.51	
403	391	Maer Hills	Camp Hill/Camp Wood	Maer	Accessible Natural Greenspace	219.20	62
445	909	Maer Moss		Maer	Accessible Natural Greenspace	4.30	69
473	944	Shropshire's Wood		Maer	Accessible Natural Greenspace	0.93	
503	975	Dorothy Clive Garden		Maer	Accessible Natural Greenspace	3.61	79
10 sites					Subtotal	356.73	
362	96	Radwood Copse		Whitmore	Accessible Natural Greenspace	1.77	
363	97	Moat Wood		Whitmore	Accessible Natural Greenspace	1.60	
364	98	Moat Wood		Whitmore	Accessible Natural Greenspace	2.85	
365	99	Pleck Wood		Whitmore	Accessible Natural Greenspace	2.32	
366	100	Holbrook Wood		Whitmore	Accessible Natural Greenspace	7.33	
367	101	Bentilee Wood		Whitmore	Accessible Natural Greenspace	2.88	
368	102	Bentilee Wood		Whitmore	Accessible Natural Greenspace	2.00	
369	110	Knights Wood		Whitmore	Accessible Natural Greenspace	5.37	
370	111	Grange Wood		Whitmore	Accessible Natural Greenspace	1.80	
371	112	Church Wood		Whitmore	Accessible Natural Greenspace	4.79	
385	149	Whitmore Wood		Whitmore	Accessible Natural Greenspace	17.85	
467	938	Aldersey's Rough		Whitmore	Accessible Natural Greenspace	8.29	
468	939	Penfields Wood		Whitmore	Accessible Natural Greenspace	5.13	

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469	940	Bentilee Wood		Whitmore	Accessible Natural Greenspace	3.01	
470	941	Bentilee Wood		Whitmore	Accessible Natural Greenspace	0.46	
471	942	The Rookery		Whitmore	Accessible Natural Greenspace	5.18	
474	945	Whitehouse Wood		Whitmore	Accessible Natural Greenspace	1.21	
475	946	Whitmore Heath		Whitmore	Accessible Natural Greenspace	5.57	
476	947	The Lymes		Whitmore	Accessible Natural Greenspace	0.51	
483	954	Woodland on Acton Lane, Acton		Whitmore	Accessible Natural Greenspace	4.10	
484	955	Whitmore Hall		Whitmore	Accessible Natural Greenspace	21.04	
22 sites					Subtotal	105.06	
33 sites					TOTAL	472.35	

The following listings are incorrect.

Site 552 is in Loggerheads parish.

Site 316 is in Madeley parish.

These sites should also be removed from the list as they are privately owned and not publicly accessible.

552	1097	Willoughbridge Park		Maer	Accessible natural greenspace	21.87	69
361	95	Hey Sprink		Whitmore	Accessible Natural Greenspace	39.33	

Further comment on private maintenance agreements

In Whitmore Parish the following site is subject to a private maintenance agreement:

Site No.	Reference	Name		Parish	PPG17 classification (primary purpose) - OS Typology	Area (Ha)	Overall % Quality Score
489	960	Heronpool	Lakeside Close Open Space	Whitmore	Accessible natural greenspace	1.16	71

This open space is regarded by residents of the development as private to the development, and is also understood in the community to be private to the development. The open space is fenced off and is not accessible. The only person who accesses it with any regularity is the groundsman who mows the grass. The current restriction of access means that it is of no benefit to anyone as Public Open Space and is, effectively, not Public Open Space.

A new development in Whitmore parish, on land adjacent to Gateway Avenue, will have Public Open Space that is to be maintained via a private maintenance agreement. Will this Public Open Space be truly accessible to all comers, or will residents of the development be able to impose conditions on accessibility?