

SOUTH STAFFORDSHIRE LOCAL PLAN 2018-38 PREFERRED OPTIONS

LAND AT ROYAL'S FARM, CANNOCK

ON BEHALF OF BLOOR HOMES



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	PLANNING POLICY CONTEXT	2
3.	DEVELOPMENT STRATEGY	5
4.	SITE ALLOCATIONS	10
5.	DEVELOPMENT MANAGEMENT POLICIES	11
6.	LAND AT ROYAL'S FARM	22
7.	CONCLUSION	30

APPENDIX 1: Site Location Plan

APPENDIX 2: Illustrative Layout



1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes, responds to the Regulation 18 'Preferred Options' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land at Royal's Farm, Cannock where Bloor Homes has secured land interests. A site location plan is attached at **Appendix 1**.
- 1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.
- 1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. Planning Policy Context

2.1 Bloor Homes supports South Staffordshire District Council in progressing with a review of the South Staffordshire District Plan as required by Policy SAD1. This provides the opportunity for the Council to comprehensively review the following matters:

- South Staffordshire's own objectively assessed housing need and the potential for housing supply within the District (including existing safeguarded land identified through the Site Allocations Document) to meet this need.
- The potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Greater Birmingham Housing Market Area (GBHMA), including from the Black Country.
- Employment land requirements for South Staffordshire
- South Staffordshire's potential role in meeting wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.
- The need for further additional safeguarded housing and employment land for longer term development needs, and the role of safeguarded land in meeting housing shortfalls across the GBHMA, including South Staffordshire's own needs.
- Gypsy, Traveller and Travelling Showpeople provision.
- A comprehensive Green Belt Review undertaken jointly with the Black Country authorities, to inform any further Green Belt release to accommodate new development within the District.

2.2 The National Planning Policy Framework (NPPF 2021) requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.

2.3 Bloor Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists with the District to guide growth to 2038 and to ensure that development is genuinely plan-led.

2.4 The Preferred Options consultation document follows the identification of the Council's preferred spatial housing strategy in October 2019, which identified a proposed settlement hierarchy and an approach to delivering infrastructure-led development in line with settlement hierarchy and larger urban extensions focused to the north of the Black Country conurbation.

2.5 The Preferred Options consultation document identifies preferred site allocations to meet the preferred strategy, including a number of strategic housing allocations (SA1).

Question 1: Do you agree that the evidence base set out in Appendix A is appropriate to inform the Local Plan?

2.6 Appendix A identifies a broad range of evidence documents to be relied upon by the Council in formulating the Local Plan.

2.7 Concern is raised that the following documents, which were referenced in the Spatial Housing Strategy consultation document, are no longer listed:

- Greater Birmingham HMA Strategic Growth Study.
- Strategic Housing & Employment Land Availability Assessment

2.8 The Greater Birmingham HMA Strategic Growth Study remains the latest comprehensive consideration of housing needs across the Greater Birmingham and Black Country HMA and provides a range of recommended options for meeting these needs, to be tested through individual LPA Local Plan reviews. This evidence has been subject to scrutiny as supporting evidence at the North Warwickshire Local Plan EiP and provides justification for the Council's intended contribution of 4,000 homes to assist in meeting the shortfall.

2.9 The Strategic Housing & Employment Land Availability Assessment (SHELAA) establishes the broad range of site options to be tested by the Council in determining the appropriate housing and employment allocations necessary to meet identified needs.

2.10 In addition, it is considered the Self Build & Custom Build Register should be identified as part of the evidence base to inform emerging policies in respect of housing needs and mix.

Question 2: Do you agree that the correct infrastructure to be delivered alongside proposed site allocations has been identified in the IDP?

- 2.11 Bloor Homes supports the Council's proposed infrastructure led strategy which seeks to focus development towards larger and better-connected settlements and where appropriate deliver new infrastructure benefits alongside new development.
- 2.12 The IDP, identifies the correct infrastructure projects to support the proposed spatial development strategy based upon the evidence currently published. Bloor Homes recognises that the IDP is a living document and further evidence planned for publication may influence site specific infrastructure requirements.

Question 3a: Have the correct vision and strategic objectives been identified?

- 2.13 The Vision is clear and succinct, however as presently drafted it doesn't appear locally relevant and contains no spatially specific elements.
- 2.14 Bloor Homes supports the strategic objectives identified. These are considered succinct, locally relevant and relate to the most important areas of change or protection within the District.

Question 3b: Do you agree that the draft policies and policy directions will deliver these objectives?

- 2.15 Bloor Homes considers the draft and emerging policies will assist in delivering these objectives.

3. Development Strategy

3.1 Bloor Homes supported Spatial Housing Option G identified through the previous Strategic Housing Strategy and Infrastructure Delivery consultation undertaken in 2019. It is noted the proposed strategy represents a refinement of this option.

Question 4: Do you support the policy approach in Policy DS1 – Green Belt and Policy DS2 – Open Countryside?

3.2 In terms of the strategic approach to the Green Belt there is an acceptance within the Local Plan that there needs to be changes to the Green Belt boundary to accommodate growth requirements within the Plan period. It is agreed that Green Belt release is necessary to deliver a sustainable spatial strategy.

3.3 Consideration also however needs to be given to the permanence of the Green Belt beyond the current plan period.

3.4 Paragraph 140 of the NPPF states:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”

3.5 The consultation document recognises that the character of South Staffordshire is directly influenced by the fact that around 80% of the District lies within the West Midlands Green Belt. The rural nature of the District also results in a lack of brownfield opportunities to meet any future housing needs beyond the proposed plan period.

3.6 The proposed spatial development strategy for the period to 2038 can demonstrate exceptional circumstances for the release of Green Belt to deliver sustainable growth to 2038 and, in light of the District Green Belt constraints, further Green Belt release will be required beyond 2038 to meet future development requirements, even if such requirements only relate to meeting local housing needs.

3.7 The Site Allocations Document identified a number of safeguarded land sites to meet longer term growth requirements and this Local Plan review should take a

similar approach to ensure Green Belt boundaries endure well beyond the plan period.

- 3.8 In light of constraints to development within Cannock Chase District, it is considered likely that further growth will need to be directed to the edge of Cannock in the longer term to support cross boundary matters.

Question 5: Do you support the policy approach in Policy DS3 – The Spatial Strategy to 2038?

- 3.9 Bloor Homes generally supports the policy approach set out in Policy DS3 (The Spatial Strategy to 2038), however further commentary is set out below in respect of different elements of the spatial strategy relevant to housing delivery.

Local Housing Need

- 3.10 The Strategic Housing Market Assessment (SHMA) sets out a minimum housing requirement of 254 dpa based on the Government's standard method. The PPG is clear however that the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure recognising there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

- 3.11 Paragraph 010 of the PPG (ID: 2a-010-20201216) states:

"Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;"*

- 3.12 Other circumstances that should be considered in respect of South Staffordshire District include the balance between housing growth and jobs created over the plan period.

3.13 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

3.14 The unmet housing need arising from within the wider Greater Birmingham and Black Country Housing Market Area is well documented.

3.15 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed upon adoption.

3.16 The Black Country LPAs are currently undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local Plan review. Evidence that has informed the emerging Black Country Local Plan includes an urban capacity assessment. The Urban Capacity Review (2019) concludes that the amount of housing need which cannot be accommodated in the Black Country urban areas remains significant, at around 26,920 homes to 2038.

3.17 The Draft Black Country Plan 2018-2039, subject to consultation in 2021, identified a shortfall of 28,239 homes to be exported to neighbouring LPAs through the Duty to Co-operate.

3.18 The shortfall figures above do not take into consideration the 35% urban uplift introduced in December 2020 which would be applicable to both Birmingham and Wolverhampton.

3.19 Bloor Homes supports the Council's approach to providing an additional 4,000 homes to assist with meeting the unmet need. The figure of 4,000 appears reasonable and is justified by shared evidence produced by constituent LPAs within the HMA.

3.20 As set out above, due to constraints present within Cannock Chase District, it is likely that future unmet needs may need to be accommodated on the edge of Cannock, within South Staffordshire District.

Economic Uplift

3.21 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5, highlighting that the working age population will increase by 3,489 people between 2018 and 2038, which represents growth of 5.4%. If the current job density is maintained in 2038 it is anticipated that an extra 1,989 new jobs will be required to support the uplift in the working age population. Jobs growth would need to rise to 2,826 to support an increased job density in line with the wider West Midlands region.

- 3.22 The number of jobs likely to be created within South Staffordshire is likely to significantly exceed the 2,826 required to support the West Midlands regional job density by virtue of committed development at the West Midlands Interchange (WMI) which in itself is projected to create 8,500 jobs of which 40% will be higher skilled and this level of growth would represent 17% of the Stoke-on-Trent and Staffordshire LEP's new jobs target to 2030. In addition, significant jobs growth will be provided through committed strategic employment developments planned at i54 and ROF Featherstone.
- 3.23 At present the SHMA fails to consider whether the minimum local housing need figure derived from the standard method would support the necessary growth in the working age population to create a balanced community within South Staffordshire to support such jobs growth, even taking into consideration the 4,000 additional homes to meet unmet needs in the wider housing market area. This balance is important to ensure sustainable commuting patterns and reduce in-commuting from the Black Country.
- 3.24 Further evidence is required to consider the balance between jobs and the working age population that would be necessary to satisfy the jobs demand. This may require an uplift in local housing needs identified.

Settlement Hierarchy

- 3.25 Bloor Homes supports the settlement hierarchy which considers the relative sustainability of villages within South Staffordshire District. The Tier 1 and Tier 2 settlements identified contain the widest range of services and facilities and by focusing new homes to these settlements would provide an opportunity to increase sustainability and self-containment.
- 3.26 While the Rural Services and Facilities Audit does not consider locations adjacent to other adjacent towns and cities, these locations are recognised as sustainable locations for growth with over 2,500 homes focused to neighbouring towns and cities within the plan period. Cannock is a sustainable town on the edge of South Staffordshire District.

Spatial Distribution of Housing Growth

- 3.27 Bloor Homes supports the proportionate distribution of housing growth across the villages, with the most sustainable villages to deliver a higher amount of growth.
- 3.28 Housing growth also appears to be focused to the north of the District which aligns to the location of the most sustainable settlements and the proposed

employment strategy, that seeks to deliver thousands of new jobs in the northern extent of the District, including the freestanding employment sites at ROF Featherstone, i54 and Four Ashes. Significant jobs growth is also proposed within neighbouring Cannock. These elements of the District are also far more connected to major road and rail infrastructure.

- 3.29 Allowing growth in the most sustainable settlements provides an opportunity to meet locally arising housing needs and offers opportunity to deliver new services, facilities and infrastructure that would assist in addressing local issues and provide community benefit for residents.
- 3.30 It is noted that no proposed growth is identified to the west of Cannock within South Staffordshire District in the emerging Local Plan due to Cannock District's lack of unmet need in the short term.

Question 6: Do you support the policy approach in Policy DS4 – Longer Term Growth Aspirations for a New Settlement?

- 3.31 Bloor Homes notes Policy DS4, which recognises the Council's aspiration to explore the potential for a sustainable, independent new settlement.
- 3.32 Policy DS4 recognises that such an option would not contribute to housing growth during the proposed plan period to 2038 which is agreed. A new settlement proposal, even if a suitable and viable option were to be identified, would take a long time to masterplan and deliver and would need to be delivered alongside infrastructure on a scale much larger than a usual development.
- 3.33 Support for a new settlement in the longer term should not be at the expense of supporting growth in the sustainable settlements beyond the plan period. As discussed previously, safeguarded land should be identified within this Local Plan to provide permanence to the Green Belt boundary and to support longer term growth requirements. This balanced approach would allow for longer term growth to meet longer term needs within the villages and neighbouring LPAs alongside strategic growth within a new settlement.

4. Site Allocations

4.1 Bloor Homes has a number of land interests within South Staffordshire District. This representation relates to Royal's Farm, Cannock and should be read in conjunction with other representations submitted in respect of the proposed allocations.

Question 7a: Do you support the proposed strategic housing allocations in policies SA1-SA4?

4.2 Bloor Homes supports the proposed identification of strategic housing allocations and has land interests in respect of East of Bilbrook and North of Penkridge.

Question 7b: Do you agreed that given the scale of the 4 sites detailed in policies SA1-SA4, these warrant their own policy to set the vision for the site, alongside a requirement for a detailed masterplan and design code?

4.3 Bloor Homes recognises the importance of the four proposed strategic housing allocations in delivering the spatial strategy for the District to 2038. Due to the scale of the four sites Bloor Homes supports the inclusion of site-specific policies to establish a vision for each site, alongside a requirement for a detailed masterplan and design code.

4.4 The key infrastructure and design requirements are helpful in informing the masterplan and design code.

Question 8: Do you support the proposed housing allocations in Policy SA5?

4.5 Bloor Homes considers safeguarded land should be identified for longer term housing needs that relate to the local housing need and any future unmet needs arising in neighbouring authorities. Land at Royal's Farm should be considered for this purpose.

5. Development Management Policies

5.1 Bloor Homes notes that this consultation document only outlines a general policy approach to non-strategic policies at this stage. Further considered comments can be provided once development policies are fully drafted.

5.2 Therefore, the following comments are intended to provide a helpful steer in drafting the proposed policies.

Question 11: Do you agree with the proposed policy approaches set out in Chapter 6?

5.3 Bloor Homes would wish to raise a general concern that the direction for travel for a number of policies relating to major residential schemes are overly prescriptive and have no regard to the context of a site within a wider settlement or any site specific constraints and opportunities. For example, the policy directions seek to prescribe a specific District wide density, detailed housing mix requiring at least 75% of proposed dwellings to be three bedrooms or less, and within this mix it is expected that properties will comply with NDSS, 30% will be required to meet M4(2) standard and potentially there will be a need to deliver an additional specific percentage as bungalows. In addition, the POS requirement requires all schemes of 33 dwellings or above to incorporate centrally located public open space where equipped play is provided as default. This prescriptive approach is in danger of stifling innovation, undermining high quality design and resulting in a large number of identikit housing proposals that lack variety in housing provision or reflect/create local identity.

HC1 – Housing Mix

5.4 The policy requires a flexible approach, recognising that the size and type of housing will change over the plan period and may be different across the District. It also needs to reflect demand, which is often very different to need, where households seek flexibility to grow a family without having to trade up or additional space to work from home.

5.5 Bloor Homes considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year plan period. This ensures that housing mix is reflective of market-driven need.

5.6 Bloor Homes would wish to raise concerns that the proposed direction of travel appears overly prescriptive with all market housing proposals to include 75% of

properties to comprise three bedrooms or less and a further specific breakdown to be applied on a site-specific basis. This does not provide a good level of flexibility to allow for changing market signals across the plan period or to address varying needs in different locations within the District.

HC2 – Housing Density

- 5.7 Bloor Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a District-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to the prevailing housing market conditions, local character, context and other planning policy requirements or environmental designations or constraints.
- 5.8 It should be noted that the housing mix requirements will influence density recognising that bungalow provision and adaptable and flexible housetypes will have greater land take.
- 5.9 In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.
- 5.10 Nevertheless, due to the size of the site at Land at Royal's Farm, Cannock and the lack of identified unmitigable constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum average net density of 35dph. However, this would be achieved through the provision of character areas of varying density and would be reflective of the character of surrounding development.

HC3 – Affordable Housing

- 5.11 Bloor Homes notes that for all major developments 30% of all homes are to be delivered as affordable housing. This appears to be supported by the Viability Study which determines the current affordable housing requirement of 40% affordable provision is very unlikely to prove supportable with increased infrastructure costs.
- 5.12 It is recognised that a Stage 2 Viability Assessment will be undertaken once more refined and bespoke assumptions regarding infrastructure and development costs are known. It is understood that the Infrastructure Delivery Plan will continue to be evolved and refined as the Local Plan review progresses.
- 5.13 Bloor Homes considers it is essential for affordable housing delivery targets to be tested alongside all other policy requirements and burdens to ensure that

the total cumulative cost of all relevant policies do not undermine the deliverability of the Local Plan.

- 5.14 Bloor Homes would welcome the opportunity to engage with the Council and the appointed viability consultants prior to the publication of the Stage 2 Assessment.

HC4 – Homes for Older People

- 5.15 The proposed direction of travel requires major residential development to make a clear contribution to meeting the needs of the District's ageing population. It is not clear whether this is a continuation of the Council's current approach of requiring 10% of all homes to be delivered as bungalows or other ground floor accommodation.

- 5.16 It is considered that a specific requirement for bungalows is not appropriate if instead the Council pursues a policy of requiring 30% of all homes to meet optional M4(2) requirements. M4(2) dwellings are described as making:

"reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users."

- 5.17 The Strategic Housing Market Assessment 2021 (SHMA) includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing and technical standards.

- 5.18 The HMA concludes that, in general, South Staffordshire District has an older age structure (in terms of older people) compared with the wider region and nationally. It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to South Staffordshire. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

- 5.19 The SHMA identifies a need for 1,793 accessible and adaptable general homes for those over 65 and 1,235 for those under 65 to 2038. This equates to less than 30% of the planned housing supply to 2038. Bloor Homes considers that whilst there may be justification for implementing optional M4(2) standards, the 30%

requirement set out is excessive and not justified, especially where this could be in addition to other requirements set out for bungalow provision.

HC7 – Self & Custom Build Housing

- 5.20 National Planning Policy Guidance notes a responsibility for 'relevant authorities' to maintain a self-build and custom housebuilding register. In understanding the need for self and custom build the PPG recognises the role of the Strategic Housing Market Assessment in understanding the size, type and tenure of housing needed for different groups including people wishing to self-build or custom build their own homes.
- 5.21 The SHMA identifies 15 applicants on the self-build register as of December 2019, recognising that 3 of these applicants are also on a register within another LPA. This demonstrates a very low level of demand. Additionally, the self-build register only needs to include the name and address of the lead contact and the number of serviced plots of land they are seeking to acquire- no information is requested on the financial resources. 'Demand' could be an expression of interest rather than actual demand.
- 5.22 The policy direction does not suggest a specific percentage of self and custom build homes will be required on allocated sites, instead 'encouraging' the provision of serviced plots for self-build and custom housebuilding as part of an appropriate mix of dwellings on all major developments. Bloor Homes considers this to be a proportionate response to the evidence that has been published.
- 5.23 If custom and self-build requirements are to be set out in policy, there needs to be a mechanism identified to allow for such plots to come forward for market housing if demand is not present. For example, if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.
- 5.24 Practical difficulties of facilitating self and custom-build plots on larger sites should also be recognised, creating issues with health and safety and the need for independent construction access point.
- 5.25 In light of the above, if demand does increase, it would be preferable for small sites to be identified which are more suitable for self and custom build plots.

HC9 – Design Requirements

- 5.26 Bloor Homes supports the introduction of a new set of requirements to ensure high quality design and the creation of beautiful places in line with Government guidance.
- 5.27 Development management policies, which are intended to guide the determination of planning applications should be established through policy with requirements on design quality set out in sufficient detail without relying on other criteria or guidelines set out in an SPD which has not been subject to examination.

HC11 – Space about Dwellings & Internal Space Standards

- 5.28 Bloor Homes has limited comment in respect of the space about dwellings standards currently utilised by the District Council which are generally considered appropriate.
- 5.29 However, if bungalows are to be provided within a scheme, it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views. At present reduced garden requirements only relate to 1 bed specialist housing rather than single storey general housing in the adopted standards.
- 5.30 Bloor Homes wish to object to the internal floorspace policy direction.
- 5.31 The Nationally Described Space Standards (NDSS) were published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.
- 5.32 In introducing the standards, the Written Ministerial Statement outlines:

“New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system

which will reduce burdens and help bring forward much needed new homes."

- 5.33 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

"From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy."

- 5.34 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance."

- 5.35 The reference to the National Planning Policy Framework relates to paragraph 130 which states planning policies should:

"create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users."

- 5.36 Footnote 49 makes it clear that use of the Government's optional technical standards should be used where this would address an identified need for such properties and the need for an internal space standard can be justified.

- 5.37 National Planning Guidance states:

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."

- 5.38 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability.
- 5.39 The South Staffordshire Housing Market Assessment provides limited commentary in respect of NDSS. The focus of this commentary, contained within the Accessible and Adaptable Housing section on page 90 relates to M4(2) and M4(3) standards and provides no justification for the requirement of NDSS on all new dwellings. It appears to imply that the NDSS is a national standard that should automatically apply. As set out above, this is incorrect. It also highlights that any requirements should be assessed to determine whether they are viable and should not impose any further requirements beyond building regs.
- 5.40 It is clear evidence does not currently support the imposition of the optional NDSS within South Staffordshire. To the contrary, the evidence highlights a number of potential risks if such a policy were to be introduced. The Council must provide adequate evidence of need if it is to require the application of NDSS in the Local Plan 2018-2038.

HC12 - Parking Standards

- 5.41 Bloor Homes supports the existing parking standards contained within the Core Strategy.
- 5.42 In addition, Bloor Homes supports the requirement to provide electric vehicle charging infrastructure. The Council will need to review the need for a planning

policy in relation to EV charging points given that this is due to be dealt with in the Building Regulations.

HC14 – Health Infrastructure

- 5.43 Bloor Homes recognises the need for development to address unacceptable impact on health infrastructure. It is recommended that engagement with the CCG informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC15 – Education

- 5.44 Bloor Homes supports the proposed direction of travel in respect of education infrastructure which appears to represent a continuation of the current approach.
- 5.45 It is recommended that engagement with SCC Education informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC17 – Open Space

- 5.46 Bloor Homes notes the proposed direction of travel in respect of open space which proposes a reduced open space requirement of 0.006ha per dwelling compared to the existing standard of 0.01ha.
- 5.47 Concern is raised that the emerging requirements appear to provide no flexibility with regards to a site's context. For example, the assumption that all on-site open space should include equipped play provision as a default is unreasonable where good quality, accessible equipped play is already located within the immediate vicinity of a site. In addition, the requirement for open space to be centrally located may not be appropriate when considering on-site constraints and the location of existing open space in the vicinity.
- 5.48 It is recommended that distance isochrones are identified within the policy for different open space typologies such as LEAPs and LAPs to ensure open space infrastructure has regard to the needs of the wider settlement.

HC18 – Sports Facilities & Playing Pitches

- 5.49 Bloor Homes notes the Indoor Sports Facilities Strategy and Playing Pitch Assessment/Strategy that forms part of the evidence base for the emerging Local Plan.

5.50 It is recommended that engagement with Sport England and sports clubs/sporting bodies informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

HC19 – Wider Green Infrastructure Design Principles

5.51 Bloor Homes supports the provision of multi-functional greenspace as part of strategic developments.

EC3 – Inclusive Growth

5.52 The requirement for an Employment and Skills Plan to be prepared for all developments of 100 or more residential units is not supported by Bloor Homes.

5.53 Bloor Homes is committed to doing its part to help to resolve the well-documented national housing crisis, and in doing so recognises that addressing the construction skills shortage is of critical importance. Bloor Homes as a company has committed to the Home Building Skills Pledge, and in doing so have or are putting in place the following initiatives on a business wide basis:

- Relaunch and expansion of their unique apprenticeship scheme in 2014. They directly employ over 1002 apprentices at any one time on a 3-year programme, which represents around 15% of their workforce. The Bloor scheme is unique in that they directly employ at least two apprentice masters in each region (bricklaying and carpentry). The apprentice masters all have site and teaching experience, and are paid and incentivised solely to bring apprentices through the programme (i.e. they are not also expected to carry out work as a tradesmen alongside their mentoring roles).
- Ongoing trainee programme. Alongside the apprenticeship scheme, the trainee programme seeks to take in at least four trainees per region each year in the technical (architecture and engineering), surveying, sales and site management departments.

5.54 Whilst Bloor Homes recognises the importance of providing employment and skills initiatives that will impact on directly on the local areas in which they develop, the limitations arising as a result of the business model employed by Bloor Homes and all of the other major housebuilders should also be taken into account:

- All major housebuilders typically operate each site with a handful of directly employed staff (Site Manager, Assistant Site Manager, Labourer, Forklift Truck Driver etc) with all trades being sourced through subcontract businesses.
- Direct employees as a rule move from development to development as one site nears completion and the construction of others starts, rather than being recruited from the area local to the development.
- Management and back-office support teams are based in regional hubs – for example, the Midlands region has an office in Tamworth to cover an operating area stretching from Oakham to Shrewsbury on an east-west axis and from Nottingham to Stratford upon Avon on a north-south axis

5.55 As a result, it is unrealistic to expect students near a given development site looking for management and back-office work experience to travel to the regional office, which could be up to 50 miles away. In addition, due to the sub-contracting of the majority of the trades on any given site, such an ESP may not be able to provide any measurable evidence on local job creation or provide certainty in respect of inclusive growth.

NB2 – Biodiversity

5.56 The intention of Policy NB2 is recognised by Bloor Homes. However, Government policy and guidance are not yet requiring a 10% Biodiversity Net Gain, with the NPPF instead stating only that development should ‘provide net gains of biodiversity.’ Policy wording should instead seek biodiversity net gains in line with the Government’s latest legislation, policy or guidance. Bloor Homes is also aware that it is the Government’s intention to introduce exemptions applicable to the most constrained types of development which will be set out in secondary legislation and as such flexibility should be provided and a specific target, if included, should not relate to ‘all development.’

NB3 – Cannock Chase SAC

5.57 Bloor Homes notes further evidence in respect of Cannock Chase SAC, including a review of mitigation measures and visitor survey, is due to be published in 2022. This evidence should inform the policy approach to addressing any impact arising from development on Cannock Chase SAC and determine whether on-site mitigation will be effective in addressing such impact.

NB6 – Energy & Water Efficiency & Renewable Energy

- 5.58 Bloor Homes supports the direction of travel in respect of carbon reduction and consider that planning has an important role in the delivery of new renewable and low carbon energy infrastructure. However, policies should ensure that they follow nationally consistent set of standards/timetables and are implementable. Bloor Homes considers the success of achieving a low carbon future is by standardisation rather than individual council's specifying their own policy approach to energy efficiency.
- 5.59 Changes to building regulations (Part L) to deliver the Government's 'Future Homes Standard' means that from mid-2022, new homes will have a 31% reduction in CO² when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO² when compared to today, along with a new focus on rating primary energy efficiency as well as CO².
- 5.60 Bloor Homes already applies a 'fabric first' approach in their house type design. The fabric first approach has a number of clear benefits, notably that it is built into the property for its whole life ensuring that every occupier will benefit from a reduced electricity bill and it reduces CO² emissions.

Question 12a: It is proposed that the fully drafted policies in this document (Policies DS1-DS4 and SA1-SA7) are all strategic policies required by paragraph 21 of the NPPF. Do you agree that these are strategic policies?

- 5.61 Bloor Homes agrees that the policies outlined above represent strategic policies.

Question 12b: Are there any other proposed policies in Chapter 6 that you consider should be identified as strategic policies?

- 5.62 Final drafted policy wording would be required to determine whether a policy is strategic.

6. Land at Royal's Farm

6.1 This Chapter sets out a brief description of the site, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Paper.

Site Description

6.2 Bloor Homes has current land interests at Royal's Farm as shown on the Site Location Plan appended to this representation (see **Appendix 1**).

6.3 This land represents a logical site for development adjacent to the sustainable town of Cannock, providing an opportunity for delivering approximately 550 new homes with associated supporting infrastructure.

6.4 The site comprises several agricultural field enclosures, currently in arable use. It sits immediately adjacent to the south-western edge of Cannock which in this location is characterised by a mix of mid to late twentieth century residential dwellings.

6.5 The eastern boundary comprises a dense tree belt that occupies the lowest part of the site, with a break in vegetation at the north-eastern corner of the site where a stile provides access to one of the public rights of way (PROW) that cross it. The southern boundary comprises a mixture of field boundary hedgerows, an undefined track, and the A5 Watling Street road corridor. The western boundary comprises a hedgerow field boundary and some properties accessed from Poplar Lane; and the northern boundary comprises a hedgerow boundary along Poplar Lane itself.

6.6 The landform of the site generally slopes to the north-east and south-west from a high point near to the north-western boundary of the site, where it reaches ca. 141m AOD (above ordnance datum). Its low point is at ca. 120m AOD along the eastern boundary.

6.7 There are two PROW that cross the site itself: Hatherton 3 which starts at Poplar Lane and ends at the A5 Watling Street, and Hatherton 5 which also starts at Poplar Lane to the north of the site and passes through it to connect with footpath Hatherton 3. Footpath Hatherton 9 also passes along the access road to properties immediately west of the site boundary.

6.8 The site is broadly consistent with the wider landscape context in terms of its intensified arable land use, and the associated scale of the wider field patterns. However, there is also a strong relationship between the site and the settlement pattern, given the proximity of the site to the wider settlement area of Cannock

along with the prominence and influence on the local landscape character of the commercial and industrial edge, centred on the A5 Watling Street in this location.

6.9 The illustrative masterplan identifies the following key proposals:

- Provision of approximately 550 market and affordable homes;
- Provision of significant green infrastructure, including opportunity for the provision of village greens, green corridors, playing fields, community orchard, allotments and equipped play;
- Provision of SuDS;
- A development which respects the adjoining neighbours in terms of providing landscape buffers between existing and proposed homes; and
- A sensitive, high quality green infrastructure network that seeks to reinstate historic field boundaries, maintains and improves biodiversity in the area, whilst maintaining many of the existing hedgerows and trees.

Sustainability Appraisal (SA) Findings

6.10 The Council's Preferred Options Sustainability Appraisal (2021) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.

6.11 Bloor Homes would contend the assessment against the landscape and townscape SA Objective which relates to the landscape and Green Belt evidence. Further justification is set out below.

6.12 Bloor Homes would also contend the major negative impact for surface water flooding identified against the climate change adaption SA Objective on the basis an appropriate drainage strategy can be achieved to remove risk of pluvial flooding.

Sequential Test

6.13 The Council's spatial development strategy identifies an infrastructure led approach to growth. Bloor Homes accepts the site lies within the Green Belt as set out within the Housing Site Selection Topic Paper.

6.14 Bloor Homes supports the Council's conclusion that exceptional circumstances exist for removing land from the Green Belt.

Green Belt Harm

- 6.15 The site lies within the West Midlands Green Belt, adjacent to the current urban area of Cannock.
- 6.16 The Council's Green Belt Assessment (2019) indicates that development of the site would result in a 'very high' level of harm to the purposes of the Green Belt. This is disputed by Bloor Homes.
- 6.17 The site has been considered through the Cannock Chase District Green Belt Study which concluded the site was 'mid-performing,' meaning it scored moderately well across all the Green Belt purposes or had a mixture of high and low scores across the five purposes.
- 6.18 Pegasus Group has undertaken a Green Belt appraisal of Land at Royal's Farm against Green Belt purposes:

Green Belt Purpose	Site Appraisal
To check the unrestricted sprawl of large built-up areas	<p>The site is located directly adjacent to the south-western edge of Cannock and is defined to the east by existing residential development and to the south by the transport corridor of the A5. To the north and west, the existing vegetation framework on site provides some physical and visual containment.</p> <p>The site does play some role in inhibiting development along the northern side of the A5 in this location, however the southern side of the road has already been compromised by ribbon development.</p> <p>In the local landscape context, the site does not extend further west or south than the existing settlement pattern, given the existing development along the A5 in this location. This effectively contains any perception of spread that might otherwise arise from development on the site.</p> <p>Mitigation provides opportunities for new green infrastructure to reinforce the emerging settlement edge and provide a suitable boundary to the Green Belt.</p>
To prevent neighbouring towns	Matters of merging are limited in terms of nearby

<p>merging into one another</p>	<p>settlements.</p> <p>Due to its location directly adjacent to the settlement edge, the site is physically and visually contained to the east and potential development will be set back from the most elevated areas of the site.</p> <p>The closest settlements include the small hamlets of Four Crosses, located ca. 650m to the west and Hatherton, located ca. 750m to the north-west. Development within the site will not result in coalescence with either of these small settlements.</p>
<p>To assist in safeguarding the countryside from encroachment</p>	<p>Whilst the site comprises agricultural field enclosures, the site and its immediate context are already influenced by urban land uses, include a hotel and other commercial premises along the A5.</p> <p>The landscape context to the north and west would remain as 'countryside', albeit this is considered to be relatively 'ordinary' in landscape and visual terms.</p>
<p>To preserve the setting and special character of historic towns</p>	<p>The site does not lie within a Conservation Area and has no direct or indirect relationship with the historic core of Cannock.</p> <p>The character and appearance of the settlement edge currently is defined by the modern built form of residential dwellings and commercial development of varying scales and this reflects a relatively ordinary character in terms of the appearance of the settlement.</p>
<p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>This purpose, and the principles behind it, are applicable to all sites within the Green Belt.</p>

6.19 In the vicinity of the site, the spatial dimension of the openness of the Green Belt is influenced locally by:

- The existing settlement edge, which is more or less prominent to varying degrees, but particularly prominent at locations close to the site and, furthermore, are generally defined by late twentieth century or modern housing development and commercial development of varying scales.

- The extensive local road infrastructure and the existing ribbon development along main routes such as the A5 Watling Street; and
- By the landform in the area which is broadly undulating and in combination with the local vegetation framework, serves to contain the site and screen many views towards it.

6.20 In the vicinity of the site, the visual dimension is enclosed by virtue of the various combinations of landform and vegetation which serve to screen or foreshorten views to the site, in particular the strong hedgerow network that is present on the site itself and the in the local landscape context.

6.21 Notwithstanding some conflict with the purposes of Green Belt, the impact of a potential development on the site is considered to be very limited due to the containment of the site by existing and established physical features, including the existing settlement edge as well as other elements such as the road network, landform and green infrastructure.

Landscape Sensitivity

6.22 South Staffordshire District Council's Landscape Study (2019) finds that the site has 'moderate' sensitivity in landscape terms.

6.23 Whilst the findings of the Landscape Study are not necessarily disputed by Bloor Homes, the site forms part of a larger parcel that has been subject to assessment within the Landscape Study, including a large area of land to the north-west of Poplar Lane which has greater inter-visibility with Cannock Chase AONB.

6.24 The development of the illustrative proposal for this site has taken the existing green infrastructure into account to provide a landscape-led approach to development. The landscape strategy that has been incorporated within the emerging proposals include:

- Location of development away from the high point on site (ca. 140m AOD), in order to reduce likely visual impacts and allow views across the wider landscape to be retained;
- Retention of the tree belt that defines the eastern boundary of the site, as well as hedgerow boundary vegetation; and where possible location of site access points toward existing breaks and/or weaker points in the hedgerow;

- Inclusion of an appropriate stand off to existing hedgerows and mature trees to ensure retention, also providing a 'layer' of landscaping and opportunities to incorporate additional planting either as planting within public open space and/or as hedgerow enhancements;
- Enhancement where necessary of hedgerow boundaries and the tree lined PROW running through the central part of the site;
- Enhancement of the existing hedgerow network along the western boundary of the site to create a new, defensible Green Belt boundary;
- Provisions for public open space and attenuation toward the lower, eastern part of the site; and
- Ensuring any development on the more elevated parts of the site, or along the western extent of the site is of lower density.

6.25 It is considered that, with an appropriate approach to mitigation and the implementation of a robust landscape and green infrastructure strategy, a residentially led masterplan for the wider site area will be physically contained and show clear defensible boundaries.

6.26 Green infrastructure and open space as part of the proposals can also complement the existing pattern and scale of the local landscape and present an appropriate transition to the wider landscape and that development at this location would be considered acceptable in landscape and visual terms.

6.27 It is contended that the site is able to accommodate the proposed residential led development without causing undue harm to the landscape character and visual amenity of the site and surrounding countryside and footpath network.

Impact on the Historic Environment

6.28 Bloor Homes notes the findings of the HESA which confirms there would be moderate direct or indirect harm to the historic environment as a result of development associated with the wider parcel assessed. It should be noted that the Grade II Listed gate lodge is not within or adjacent to the site being promoted at Royal's Farm.

Surface Water Flooding

6.29 The site lies within Flood Zone 1 which has the lowest probability of flooding..

6.30 To address initial mitigable concerns raised by the LLFA, a Sustainable Drainage Strategy (SuDS) can be delivered:

- To efficiently drain the site whilst not causing flooding downstream;
- To create suitable habitats to promote biodiversity;
- To create ecological corridors across the site;
- To create an aesthetically pleasing setting for development; and
- To promote the site as a sustainable place to live and work.

Highways

6.31 Bloor Homes notes SCC Highways view that highways can be achieved in principle, subject to highways improvements and consultation with National Highways to consider any existing issues on the A5 corridor.

Suitability

6.32 The information set out above, read in conjunction with the appended illustrative masterplan, demonstrates that land at Royal's Farm is a suitable site.

6.33 The land parcel occupies an appropriate location in the context of the local centre, existing residential development and strategic highways corridors. The allocation of the site for residential purposes will not result in unacceptable harm to the Green Belt, but instead will provide a sustainable and well-designed extension to Cannock; that will enhance the environment by enhancing wildlife corridors and providing open spaces, to benefit local resident's well-being, while contributing to the success of local businesses.

Deliverability

6.34 There is an agreement in place between the landowner and Bloor Homes to facilitate the development of the site.

6.35 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land at Royal's Farm, however information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable. The site is available now.

6.36 The Bloor Homes is a national housebuilder with no funding or capacity constraints and the site is an area of high market demand. The site is

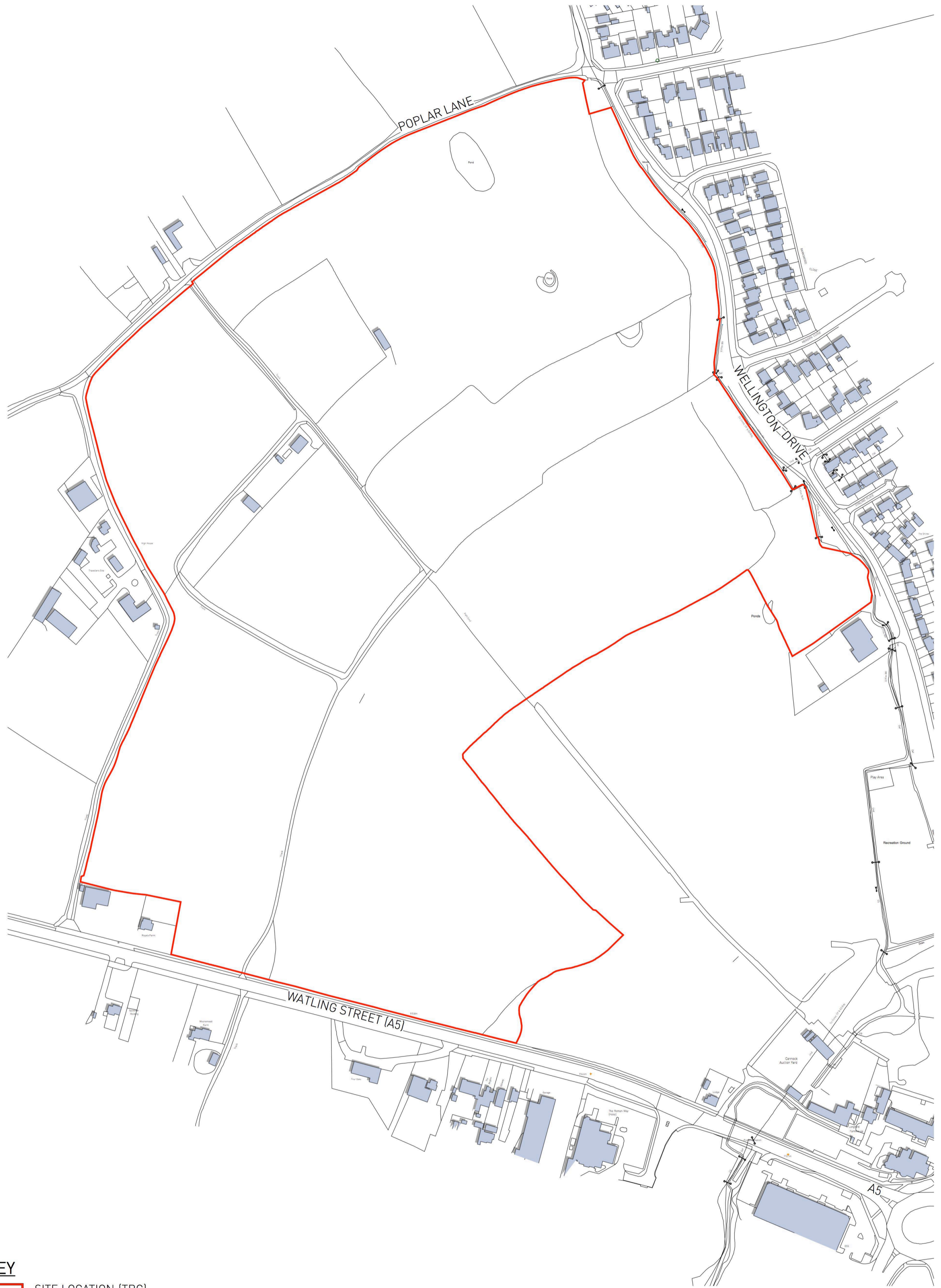
deliverable and immediately available and, subject to allocation and removal of the land from the Green Belt, could start to deliver homes and associated community benefits within the next 5 years.

7. Conclusion

- 7.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, Preferred Options (Regulation 18) consultation. This representation relates to land at Royal's Farm which is being promoted for residential-led development adjacent to the neighbouring town of Cannock.
- 7.2 Bloor Homes supports the Council's proposed spatial development strategy, which represents a refinement of Option G identified through the Strategic Housing Strategy and Infrastructure Delivery consultation published in 2019. Bloor Homes considers that this option not only assists in providing improved infrastructure but also has due regard to where housing needs exist, including within the top tier sustainable villages and locations close to the Black Country conurbation.
- 7.3 Further evidence should be provided in respect of the housing requirement to consider whether there is a need for additional housing to support likely jobs growth. In addition, Bloor Homes considers this Local Plan should be identifying safeguarded land to ensure permanence of the Green Belt well beyond the end of the plan period. Land at Royal's Farm should be considered in respect of this.
- 7.4 In addition, Bloor Homes has raised a number of concerns in respect of the direction of travel for a number of development management policies and considers it is essential for affordable housing delivery targets to be tested alongside all other policy requirements and burdens to ensure that the total cumulative cost of all relevant policies do not undermine the deliverability of the Local Plan.
- 7.5 The information contained within this representation, read in conjunction with the appended illustrative masterplan, demonstrates that land at Royal's Farm is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 7.6 There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved.
- 7.7 It is therefore submitted that Land at Royal's Farm, Cannock should be removed from the Green Belt to assist in meeting longer term housing needs.

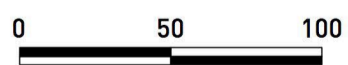
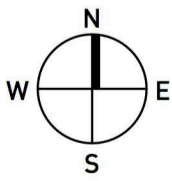
APPENDIX 1

Site Location Plan



KEY

SITE LOCATION (TBC)
 33.06 HECTARES
 81.69 ACRES



Copyright Pegasus Planning Group Ltd. Crown copyright. All rights reserved. Ordnance Survey Copyright. Licence number 100020145. English. Licence number 010020145. Standard OS licence conditions apply. Pegasus accepts no liability for any use of this document other than for its original purpose, or by the original client, or following Pegasus' express agreement in writing to any other use. 01208 641171 www.pegasusgroup.co.uk



LAND NORTH OF LONGFORD ISLAND, CANNOCK - SITE LOCATION PLAN

APPENDIX 2

Illustrative Layout



KEY	
	SITE BOUNDARY 33.08 HA 81.68 ACRES
	LOW DENSITY RESIDENTIAL DEVELOPMENT NDK 4.0/16.1/16.50 ACRES UP TO 235 DWELLINGS (AT 35 DPH)
	HIGH DENSITY RESIDENTIAL DEVELOPMENT NDK 7.0/8 HA / 19.77 ACRES UP TO 315 DWELLINGS (AT 40 DPH)
	POTENTIAL SITE ACCESS VIA WATLING STREET (TBC)
	EXISTING PRIMARY INFRASTRUCTURE
	PRIMARY MOVEMENT ROUTE
	SECONDARY MOVEMENT ROUTE
	PUBLIC RIGHT OF WAY
	POSSIBLE DIVERSION OF PUBLIC RIGHT OF WAY
	POTENTIAL PEDESTRIAN/CYCLE ROUTES WITHIN DEVELOPMENT
	EXISTING VEGETATION
	REINSTATED HISTORIC FIELD BOUNDARIES
	PROPOSED LANDSCAPE STRUCTURAL ENHANCEMENTS TO WESTERN AND NORTHERN BOUNDARY
	PROPOSED KEY FOCAL LANDSCAPE ON ARRIVAL
	ORNAMENTAL PLANTING
	PROPOSED COMMUNITY ORCHARD
	POTENTIAL LOCATION FOR COMMUNITY ALLOTMENTS
	INDICATIVE CONTOUR LEVELS (TBC WITH TOPOGRAPHICAL SURVEY)
	KEY NODAL SPACES
	LONG DISTANCE VIEWS TO WIDER CONTEXTUAL LANDSCAPE
	POTENTIAL LOCALLY EQUIPPED AREA OF PLAY
	AREA OF NATURAL PLAY
	SUSTAINABLE URBAN DRAINAGE (TBC)
	POTENTIAL POINTS OF CONNECTION TO NEIGHBOURING PEDESTRIAN MOVEMENT INFRASTRUCTURE

KEY PRINCIPLES

1. PRIMARY SITE ACCESS VIA WATLING STREET (A5);
2. PRIMARY VEHICULAR MOVEMENT, PROVIDING ACCESS TO WIDER MOVEMENT INFRASTRUCTURE;
3. SECONDARY STREETS SERVING SMALLER CLUSTERS OF DEVELOPMENT;
4. OUTWARD FACING DEVELOPMENT PROVIDING NATURAL SURVEILLANCE OVER PUBLIC OPEN SPACE;
5. NEWLY CREATED "COMMONS" THAT WILL PROVIDE AREAS OF EQUIPPED PLAY FOR NEW AND EXISTING RESIDENTS;
6. RETAINED GREEN CORRIDORS PROVIDING FORAGING ROUTES FOR WILDLIFE;
7. REINSTATED HISTORIC FIELD BOUNDARIES TO REINFORCE A STRONG GREEN INFRASTRUCTURE THROUGHOUT THE DEVELOPMENT;
8. PROPOSED KEY FOCAL LANDSCAPE ON ARRIVAL INTO DEVELOPMENT;
9. NEWLY PROPOSED LANDSCAPE STRUCTURAL ENHANCEMENTS TO WESTERN AND NORTHERN BOUNDARY;
10. FULL CIRCULATORY PEDESTRIAN AND CYCLE MOVEMENT LINKING BACK TO RETAINED PUBLIC RIGHTS OF WAY;
11. POTENTIAL LOCATION FOR SPORTING FACILITIES (TBC);
12. NEWLY CREATED "POPLAR COUNTRY PARK" PROVIDING UNOBSTRUCTED LONG DISTANCE VIEWS FROM SITE HIGH POINT;
13. POTENTIAL LOCATION FOR COMMUNITY ORCHARDS AND ALLOTMENTS FOR NEW AND EXISTING RESIDENTS;
14. POTENTIAL PEDESTRIAN LINKS TO NEIGHBOURING SITE (TBC); AND
15. UTILISED SITE LOW POINTS FOR SUSTAINABLE URBAN DRAINAGE;

