

SOUTH STAFFORDSHIRE LOCAL PLAN 2023-41 PUBLICATION PLAN

LAND AT ROYAL'S FARM



BLOOR HOMES[®]

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	DEVELOPMENT STRATEGY	2
3.	SITE ALLOCATIONS	7
4.	LAND AT ROYAL'S FARM	8
5.	CONCLUSION	16

APPENDIX 1: Site Location Plan

APPENDIX 2: Development Framework Plan



1. Introduction

- 1.1 This representation, submitted on behalf of Bloor Homes Ltd, responds to the revised Regulation 19 'Publication Plan' 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. Development Strategy

2.1 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 now represents a refinement of Spatial Housing Option C, focusing directing growth to the most sustainable villages. Spatial Housing Option C broadly reflects the approach in the adopted Core Strategy.

Policy DS1: Green Belt

2.2 In terms of the strategic approach to the Green Belt there is an acknowledgement 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.

2.3 Bloor Homes agrees that exceptional circumstances exist for Green Belt release within the district to allow for sustainable development within the plan period.

2.4 The Publication Plan 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.

Policy DS4: Development Needs

2.5 Bloor Homes generally supports the policy approach set out in Policy DS4 Development Needs however further commentary is set out below in respect of different components of the housing requirement arrived at.

Local Housing Need

2.6 The Strategic Housing Market Assessment (SHMA) 2021 sets out a minimum housing requirement of 254 dpa based on the Government's standard method, utilising the 2018 Affordability Ratios. Bloor Homes welcomes the publication of a SHMA update in 2024 which reconsiders the minimum housing requirement having regard to the latest Affordability Ratios (2022) which results in a minimum net annual requirement of 227 dwellings.

2.7 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.

2.8 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;”*

2.9 Other circumstances that should be considered in respect of South Staffordshire District include the balance between homes and jobs created over the plan period.

2.10 These circumstances are considered in further detail below.

Unmet Need from Neighbouring Authorities

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

2.12 The Birmingham City shortfall was tested through the BDP EiP and an unmet housing need to 2031 of 37,900 homes was confirmed. Birmingham City Council has now commenced a review of the Birmingham Development Plan, with an Issues and Options consultation recently published. The Issues & Options document recognised that the BDP was unable to identify enough land to meet all of Birmingham’s housing need and there is still a need to work with neighbouring authorities within the Housing Market Area (HMA) to deliver a housing shortfall. Birmingham City Council has identified a shortfall of around 78,415 dwellings following an assessment of potential capacity from all sources. While this figure will be refined through Birmingham’s plan making process, the shortfall to 2042 will remain significant.

2.13 The Black Country LPAs, were until this Autumn, undertaking a review of the Black Country Plan which is aligned to the timescales of the South Staffordshire Local

- Plan review. Evidence that informed the emerging Black Country Local Plan includes an urban capacity assessment. The Urban Capacity Review (2019) concluded that the amount of housing need which cannot be accommodated in the Black Country urban areas remained significant, at around 26,920 homes to 2038.
- 2.14 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.
- 2.15 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.
- 2.16 The Black Country LPAs took a decision to abort the joint plan-making approach to instead progress separate Local Plans.
- 2.17 The individual Black Country Authorities are now preparing their own Local Plans. Wolverhampton City Council consulted on a Regulation 18 Consultation Plan (dated February 2024) which identified a potential 11,413 dwellings shortfall. Sandwell Council held a Regulation 18 consultation ending in December 2023 which estimated around a 18,000 dwellings shortfall. Dudley Council also held a Regulation 18 consultation ending in December 2023 which estimated around a shortfall of 1,078 dwellings. It is Walsall Council's intention to proceed under new arrangements of plan making.
- 2.18 Bloor Homes supports the Council in providing a contribution to assist in meeting these unmet needs, however, raises concerns that this is not evidence based. The capacity-led approach, resulting in a contribution of 640 home contribution to the shortfall, will need to be explored and tested through the Examination in Public with neighbouring LPAs.

Economic Uplift

- 2.19 The SHMA sets out the broad economic consequences of the projected growth in Chapter 5. This references the Economic Development Needs Assessment (EDNA). The EDNA Update 2024 forecasts an additional 5,326 net additional jobs in South Staffordshire over the period 2020-2041. This compares to the 4,824 jobs within the district between 2020 and 2040 identified in the previous EDNA. This forecast is based upon methodologies of two of three forecasting houses that do not provide the basis to identify significant growth in the transport and storage sector.

- 2.20 The number of jobs to be created within South Staffordshire is likely to significantly exceed the 5,326 jobs forecast by virtue of committed development at the West Midlands Interchange (WMI) which will provide significant growth in the transport and storage sector. The WMI itself is projected to create 8,500 jobs of which 40% will be higher skilled.
- 2.21 At present the SHMA assumes that the projected growth of the working age population in South Staffordshire will grow by just 1,012 people between 2023 and 2041. This is significantly lower than the forecast jobs growth outlined in the EDNA. Further consideration should therefore be given to 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 640 additional homes to meet unmet needs in the wider housing market area.
- 2.22 Further evidence is necessary 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.

Policy DS5: The Spatial Strategy to 2041

- 2.23 Bloor Homes supports the proposed spatial strategy to 2041 which recognises environmental capacity and seeks to make best use of existing infrastructure whilst recognising opportunities to delivery new infrastructure.

Settlement Hierarchy

- 2.24 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.
- 2.25 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. Cannock is a sustainable town on the edge of South Staffordshire District.

Spatial Distribution of Housing Growth

- 2.26 Bloor Homes supports the distribution of housing growth through proportionate growth focused to the villages.

- 2.27 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.
- 2.28 It is noted that no proposed growth is identified to the west of Cannock within South Staffordshire District in the Publication Local Plan due to Cannock District's lack of unmet need in the short term.

3. Site Allocations

- 3.1 Bloor Homes has a number of land interests within South Staffordshire District. This representation relates to Land at Royal's Farm, Cannock.

Policy SA3: Housing Allocations

- 3.2 Bloor Homes is promoting Land at Royal's Farm, Cannock for residential development. This site is suitable, available and achievable and should be considered if it is determined through the Examination in Public that omission sites are necessary to make the Local Plan sound.

4. Land at Royal's Farm

- 4.1 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 2024 and preceding site assessments published in 2021 and 2022.

Site Description

- 4.2 Bloor Homes has current land interests at Royal's Farm as shown on the Site Location Plan appended to this representation (see **Appendix 1**).
- 4.3 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.
- 4.4 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.
- 4.5 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.
- 4.6 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.
- 4.7 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.
- 4.8 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.

4.9 The Development Framework Plan 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

4.10 The Council's Preferred Options Sustainability Appraisal (2022) provides an assessment of sites both pre and post mitigation and provides assessment of reasonable alternatives against the SA Objectives.

4.11 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.

4.12 Bloor Homes would also content 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

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

Green Belt Harm

- 4.14 The site lies within the West Midlands Green Belt, adjacent to the current urban area of Cannock.
- 4.15 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.
- 4.16 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.
- 4.17 Pegasus Group has undertaken a Green Belt appraisal of Land at Royal's Farm against Green Belt purposes:

Green Belt Purpose	Site Appraisal
<p>To check the unrestricted sprawl of large built-up areas</p>	<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>

<p>To prevent neighbouring towns merging into one another</p>	<p>Matters of merging are limited in terms of nearby 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>

4.18 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.

4.19 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.

4.20 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

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

4.22 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.

4.23 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.

4.24 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.

4.25 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.

4.26 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

4.27 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

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

4.29 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

4.30 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

4.31 The information set out above, read in conjunction with the appended Development Framework Plan, demonstrates that land at Royal's Farm is a suitable site.

4.32 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

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

4.34 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.

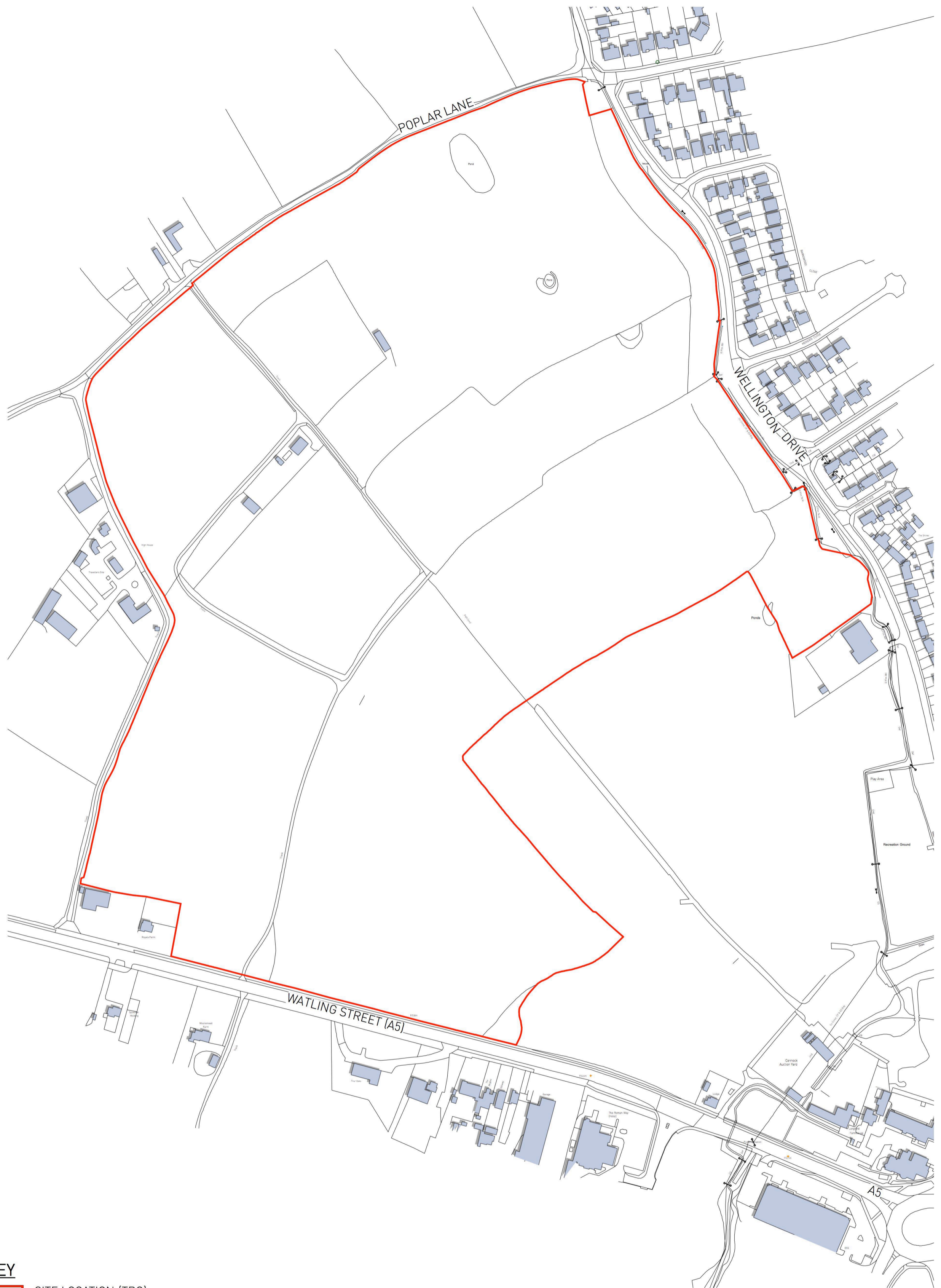
4.35 The Bloor Homes is a national housebuilder with no funding or capacity constraints and the site is an area of high market demand. The site is deliverable and available.

5. Conclusion

- 5.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the South Staffordshire Local Plan Review, revised Publication Plan (Regulation 19) consultation. This representation relates to land at Royal's Farm, Cannock, which Bloor Homes is promoting for residential-led development.
- 5.2 The information contained within this representation, read in conjunction with the appended Development Framework Plan and the Council's published evidence base demonstrates that Land at Royal's Farm is a suitable and deliverable site for residential development, subject to its release from the Green Belt.
- 5.3 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.
- 5.4 It is submitted that Land at Royal's Farm represents a sound strategic housing allocation and should be considered if, through the Examination in Public process, omission sites are required to make the Local Plan sound.

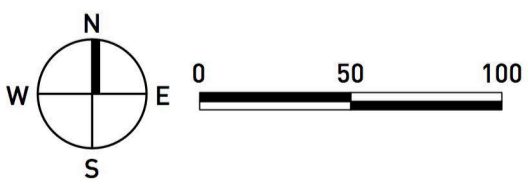
APPENDIX 1

Site Location Plan



KEY

- SITE LOCATION (TBC)
- 33.06 HECTARES
- 81.69 ACRES



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LAND NORTH OF LONGFORD ISLAND, CANNOCK - SITE LOCATION PLAN

APPENDIX 2

Development Framework Plan



KEY	
	SITE BOUNDARY 33.08 HA 81.68 ACRES
	LOW DENSITY RESIDENTIAL DEVELOPMENT NDG & 49 HA / 12.53 ACRES UP TO 235 DWELLINGS (AT 35 DPH)
	HIGH DENSITY RESIDENTIAL DEVELOPMENT NDG 7.88 HA / 19.47 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;



