



The Cranbrook Plan

2013-2031

Delivery Strategy

Habitat Mitigation – SANGS

Introduction

- 1.1 The South East Devon European Mitigation Strategy (published in 2014) helps to both identify the likely impacts on the habitats of the Pebblebed Heaths and Exe Estuary and evidences the relationship between the occupation and location of housing and the frequency and nature of trips to the habitat. As such it is an important resource in helping to understand whether a likely significant effect could result from the currently proposed development.
- 1.2 In addition a further update to this Strategy was published in 2017 which focused on the Pebblebed Heaths. Amongst other aspects this provides more up to date visitor survey information directly from the Heaths (collected in 2015).
- 1.3 Importantly many of the impacts affecting the designated environments are identified as arising from increased recreational pressure. In understanding the most recent evidence base and in particular the evidence relating to distance from which people travel to both designated habitats, there is considered to be a direct link between the housing developments at Cranbrook and its residents, and the recreational use of these environments.
- 1.4 To ensure that there are no adverse effects on the respective habitats a suite of mitigation measures are required. While part of the mitigation will be generated by commuted sum payments from development which can be used to help address on site impacts, access for future occupiers to Suitable Alternative Natural Green Space (otherwise known as SANGS) is also important.
- 1.5 If SANGS are appropriately located, of a suitable size and can demonstrate appropriate attributes, they are able to attract people away from the sensitive sites, providing alternative natural green space in which to undertake the various recreational activities. In following this approach SANGS therefore have a direct benefit of reducing the pressures which would otherwise affect the designated sites and in so doing prevents the adverse effects.
- 1.6 This Strategy focusses on how SANGS is expected to be provided for the Cranbrook Expansion.

Strategy

2.1 To properly deliver SANGS, there are three components that need to be addressed:

- a. Land identification/acquisition
- b. Establishment costs
- c. Future maintenance

Land

2.2 Recognising an average occupancy of 2.35 people in each dwelling and the minimum requirements of 8ha per 1000 population, first principles expect that each developer can secure sufficient land to meet the SANGS requirement for their particular housing development. The following table, which is based on predicted housing numbers used for the purposes of the Masterplan and which accompanies and informs the allocation policies of the DPD, sets out the currently expected SANGS requirement/delivery by developer/land owner. This is further clarified in Appendix 1 where links between the housing parcels and the areas of potential SANGS to which it is understood that they have access are identified. The parcels where there is known shortfall (identified in red below) is also identified.

SANGS AVAILABILITY	Total available by area	Requirement currently directly securable (deficit shown in red)									Net total	Required Totals
		Hallam/TW	Persimmon	Baker Estates	Farlands (4)	Stuarts	P Cuff and S Thomas (1)	Mr Smith	Mr Mingo (2)	Mrs Veysey (3)		
Bluehayes	16.40	16.24					0.39	0.25		1.17	-1.65	18.05
Treasbeare	37.00	17.21									19.79	17.21
Cobdens	28.20		22.95		5.17						0.08	28.12
Grange	18.75			9.78		3.35				1.92	3.71	15.04
Total	100.35	33.44	22.95	9.78	5.17	3.35	0.39	0.25	1.92	1.17		78.42

Shortfall not currently under direct developer control

6.98

Figure 1 – SANGS availability analysis (Bracketed numbers cross refer to plan shown in appendix 1)

- 2.3 Figure 1 demonstrates that other than for a small number of sites each land owner and developer is able to full meet the land requirements for their development. Importantly the land identified to be used as SANGS and which has been measured for the purposes of the table, are in contiguous blocks which, as well as possessing or at least are capable of possessing sufficient qualities, ensure that they can appropriately form the function of SANGS.
- 2.4 The sites that are not able to provide their own on site SANGS in a meaningful way are few in number, and with the exception of Farlands (a site of c. 250 dwellings in the Cobdens allocation), make up a small proportion of the required area. It is noted that sufficient land of a suitable quality is available at Cranbrook (on land immediately adjacent to the required SANGS in Treasbeare, Grange, and Cobdens) and therefore the final allocation of SANGS within the proposals plan expects an overprovision in these locations. While the developers of these areas are only required to “deliver” SANGS that are necessary for their developments, it is expected that they make available the additional land at a realistic price for purchase by third party developers at a fixed (index linked) price. This over provision is addressed within Policy and such land and the costs for release to third party developers should be secured through negotiation and a Section 106 agreement.
- 2.5 In the event that a developer identifies and secures other alternative land that is available for SANGS, this too may represents a suitable solution for SANGS delivery. However the land and its attributes including size and location must meet the required tests of suitability - importantly being able to provide a walk of at least 2.5km (either on their own or when directly linked to other SANGS land) and be in a position to intercept or draw potential visitors away from the protected habitats.
- 2.6 In exceptional circumstances and as an alternative to direct land provision, an offsite contribution for SANGS delivery will be explored with developers. Where it is evidenced that direct SANGS provision by the developer is unable to be secured, a financial contribution will be considered but only where it is demonstrated that such a sum represents a realistic value for SANGS acquisition, establishment and future maintenance.

Phasing

- 2.7 In terms of phasing it is expected that SANGS are brought forward ahead of housing. This is necessary to ensure that adequate mitigation is in place ahead of the relevant occupations and therefore plays a meaningful role in preventing the likely increase in demand on the habitats from day one.
- 2.8 It is unrealistic however to expect that all SANGS can be delivered upfront and therefore it will need to be delivered in tranches of sufficient area equivalent to the houses in a particular phase. To ensure that a meaningful amount of land is delivered for each tranche, it is expected that minimum areas are delivered for each phase. In this regard it is suggested that 8ha should be provided ahead of each 425 houses. This approach allows for a new Section of SANGS to be delivered for every 1000 new residents and importantly 8 hectares allows for up to 1.3-1.5km peripheral walk (depending upon the exact configuration).

- 2.9 While minimum walking lengths for a standalone SANGS target 2.5km, upwards of 1.3km still represents a reasonable length walk within a single phase. Coupled with the need to have regard to the Cranbrook Masterplan, which is also prepared as an evidence document for the DPD and together with the need to provide a comprehensive development scheme for each expansion area (In accordance with Policies CB2-5 inclusive of the Plan), it is considered that there is reasonable confidence in the approach that is being adopted. The masterplan and land safeguarded through Policy CB15 makes provision for contiguous parcels of SANGS of sufficient size to enable the full 2.5km walks to be ultimately provided. If sub phases do come forward at different stages (which is likely) it is imperative that designs for these areas ensure that future path connections for each phase are taken to the boundary of the respective phase. This will ensure that appropriate links exist between each area and ultimately that walks of the maximum potential length can be achieved. Again with the policy approach that has been set within the DPD, together with the need for design of schemes to be submitted to and agreed with the Local Planning Authority, there is sufficient design oversight to ensure that this phased approach will deliver the necessary SANGS for the Cranbrook expansion.
- 2.10 Overall it is recognised that some flexibility would be required when bringing forward SANGS but it is considered that the approach outlined which is built around a wider phasing programme acts as a starting point and demonstrates how an acceptable standard can be achieved.

Establishment and future maintenance

- 2.11 As part of the delivery of SANGS it is expected that the respective developers who have control of, or otherwise acquire suitable land, design the SANGS in accordance with an overarching implementation plan which has previously been agreed within the Council.
- 2.12 Once established it is likely that all SANGS will be transferred to a managing organisation rather than be retained by the developer. Such management must ensure that the SANGS can perform their function and be properly maintained as such for a period of at least 80 years. This comes with a cost and to ensure the proper future management of the sites, financial provision must be made by the respective developer sufficient for the full 80 year period.

Future approach and summary

- 3.1 This paper sets out a strategy that demonstrates that adequate SANGS mitigation can be secured and delivered at Cranbrook to ensure it plays a proper and meaningful role in habitat mitigation. The paper addresses how and where the land should be secured, how this is currently split between different land owners/developers and that in most instances, developers have the ability to provide their own SANGS. For the few land owners that do not enjoy such benefits, it is expected that their shortfall will be met within the area of land safeguarded for SANGS through the Plan, and the acquisition and establishment costs borne by the respective developer.
- 3.2 It is recognised that in setting this approach the strategy must remain adaptable to future changes and be treated as being a live document that is capable of being updated through the periodic review that would be necessary through the monitoring of the plan.
- 3.3 Overall, the strategy demonstrates that sufficient land for the entire Cranbrook expansion can be delivered as SANGS, ensuring that for this component of the necessary mitigation, a robust and deliverable approach exists to avoid adverse effects occurring on the designated sites.

