

# **Statement for the examination of the Cranbrook DPD**

Response to the Inspectors Matters Issues and  
Questions.

Matter 16: Subject Specific Policies

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**Contact details**

Planning Department – Cranbrook Team

East Devon District Council

Blackdown House, Border Road, Heathpark Industrial Estate,

Honiton, EX14 1EJ

DX 48808 Honiton

Phone: 01395 516551

Email: [planningcranbrook@eastdevon.gov.uk](mailto:planningcranbrook@eastdevon.gov.uk)

[eastdevon.gov.uk](http://eastdevon.gov.uk)

[@eastdevon](https://www.facebook.com/eastdevon)

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## Issue 22: Self-Build Homes

	Response	Inspectors Question(s)
1.1	<b>What is the justification for the allocation of 4% self-build homes?</b>	<b>Q180 - Justification of allocation</b>
1.2	<p>The approach to self-build at Cranbrook was developed with the help of the Right to Build Task Force. The evidence to justify the 4% element of Policy CB12 resulted from specific research that was undertaken to assess the scale and type of demand for custom and self-build housing in Cranbrook <a href="#">[Cran013<sup>1</sup>]</a>. This was part of a successful project to trial a new approach to assessing demand for self-build. More details are available on the Right to Build website <a href="#">[Three Dragons Custom and Self Build Assessment Demand Model - Right to Build Toolkit]</a> and at <a href="#">Services - Three Dragons</a>.</p>	
1.3	<p>The demand assessment model was developed to overcome the drawback of the statutory self-build registers, which only give a snapshot of demand that is of limited use in informing local plan policies. The Three Dragons demand model enables local authorities to assess long-term demand for self-build. This is a requirement of the National Planning Policy Framework which asks local planning authorities to assess housing demand for different groups in the community, including people wishing to commission or build their own homes, and to use their local plans to meet that</p>	

<sup>1</sup> <https://eastdevon.gov.uk/media/2760797/custom-and-self-build-demand-assessment.pdf>

<p>1.4</p>	<p>demand. (Please note that footnote 20 in the submission plan should link to Cran013 but links to Cran063 in error).</p> <p>The report on the model concludes that “the estimate of demand for 170 CSB plots through to the end of the plan period (i.e. 2031) is a baseline figure. Further demand could be encouraged through positive promotion of CSB and delivery of a high quality CSB environment”. [Cran013 Paragraph 2.25]</p>	
<p>1.5</p> <p>1.6</p> <p>1.7</p>	<p><b>How would a flexible figure of 4% (reviewed on an annual basis) enable smaller scale developers to commit to land? Should provision be made to enable developers to work with individuals to custom build rather than selling on to a third party?</b></p> <p>Policy CB12 has been worded to give a degree of flexibility to allow for a higher provision for self-build in the future only where this is justified through an annual review. The percentage relates to each of the expansion areas, rather than to individual parcels of land. On smaller sites this is unlikely to result in a significant increase in the number of self-build plots required. For example, on a scheme of 25 dwellings, the self-build percentage would have to double from 4% to 8% before there would be a requirement for one additional plot. Furthermore, if this would make the scheme unviable, the policy would not apply.</p> <p>Policy CB12 requires that ‘All custom and self-build plots must be actively marketed to individuals and custom build companies (as appropriate)’. This does not mean that developers would have to sell self-build land on to third parties – there is nothing in the policy</p>	<p><b>Q181 - Flexibility of allocation</b></p>

	to prevent developers offering their own custom built product directly to customers or selling individual self-build plots.	
1.8	<b>How does the volume of provision align with the number of individuals currently on the Councils register?</b>	<b>Q182 - Volume of provision</b>
1.9	Details of the number of entries on the East Devon self-build register are included in the self-build monitoring web page [ <a href="#">Self-build and custom build - Monitoring - East Devon</a> ]. At 31 <sup>st</sup> October 2019 there were 122 individual entries and no group entries.	
1.10	Please see response to Q.180 for the limitations of the self-build register in understanding demand together with how the number of entries on the self-build register was used to inform the demand model undertaken specifically for Cranbrook.	
1.11	<b>What is the delivery mechanism for these self-build plots and how will this vary for the delivery of affordable housing self-build development?</b>	<b>Q183 - Delivery mechanism</b>
1.12	The delivery model for all of the self-build plots, including affordable provision, will be through Section106. This mechanism has been successfully used to require self-build provision including by Inspectors who gave considerable weight to Unilateral Undertakings for the provision of self-build housing. [ <a href="#">APP/G2435/W/18/3214451</a> and <a href="#">APP/P1615/W/18/3213122</a> ]	
1.13	The affordable provision will be an 'intermediate' form of housing, which is defined as 'housing at prices and rents above those of social rent but below market price or rents, and which meet the	

	<p>criteria as set out in the definition for affordable housing. These can include equity loan products, shared ownership, rent to buy and intermediate rent'. [MHCLG glossary at <a href="#">A to Z - Housing statistics and English Housing Survey glossary - Guidance - GOV.UK</a> ]</p>	
1.14	<p><b>Are any Main Modifications proposed in relation to Issue 22?</b></p>	<p><b>AQ22 - Main modification</b></p>
1.15	<p>It is not considered that any main modifications are necessary in terms of the approach to self-build at Cranbrook.</p>	



## Issue 23: Zero Carbon

Response	Inspectors Question(s)
<p>2.1 <b>To what extent is the policy consistent with National Policy?</b></p> <p>2.2 There is a long standing commitment to the delivery of large scale zero carbon development at Cranbrook. This is exemplified by the roll out of the largest district heating network on a greenfield site in the UK. The opening of the rail station and the accelerated delivery of community infrastructure have also helped to demonstrate Cranbrook’s sustainable development credentials.</p> <p>2.3 The government has committed under the Climate Change Act 2008 to an 80% reduction in greenhouse gas emissions in 2050 compared to 1990 levels. It has also legislated five-year carbon budgets covering the period to 2032 to achieve this long term target. Last year the government also committed to the more ambitious target of net zero greenhouse gas emissions by 2050. They have also announced that there will be no gas boilers in new build homes from 2025. The Cranbrook Plan must respond to these future requirements.</p> <p>2.4 Policy CB13 plays a key role in taking these ambitions forward including in terms of contributing to a radical reduction in greenhouse gas emissions and supporting the deployment of renewable energy. The policy sets out a number of requirements that are entirely consistent with the NPPF and NPPG in this respect. This includes ensuring that new development is planned to help to reduce greenhouse gas emissions through its location, orientation and design and helping to increase the</p>	<p><b>Q184 - Consistency with National Policy</b></p>

<p>use and supply of renewable and low carbon energy and heat (paras 150 and 151).</p>	
<p>2.5 <b>To what extent would the supply of energy be restricted by the requirement to connect to the local CHP provision?</b></p> <p>2.6 With district heating networks householders do not have a choice in terms who provides the heat. This is necessary to create the business case for the large capital investment required to roll out DH networks. Heat is not a regulated market in the same way as gas. Nonetheless the concession agreement for the first phases of Cranbrook includes price controls whereby the unit price of heat is pegged to a basket of local gas prices. The Government is working towards the introduction of greater regulation, taking a lead from the current Heat Trust model. Householders can continue to select their electricity provider in the same way as any other householder.</p>	<p><b>Q185 - Requirement to connect to the local CHP provision</b></p>
<p>2.7 <b>Should the policy relate to carbon neutral rather than zero carbon?</b></p> <p>2.8 Policy CB13 is based on achieving the vision for Cranbrook to develop as a truly zero carbon new town. It is therefore essential that carbon emissions are addressed at source rather than relying on these being offset elsewhere. This will ensure that a radical reduction in greenhouse gas emissions is achieved and accounted for locally. This approach builds from the strong foundations that were laid for the first 2,900 homes at Cranbrook. In the context of East Devon District Council's declared climate emergency it is essential that the policy continues to be based on a zero carbon, as opposed carbon neutral, approach as any potential offsetting measures are likely to be slower to implement and harder to regulate from a policy perspective.</p>	<p><b>Q186 - Carbon neutral</b></p>

2.9 **Can all dwellings within The Grange (and other expansion areas) be within 400m of the basic facilities listed? Would Policy CB13 be effective in relation to the Grange expansion area?**

**Q187 -  
Dwellings  
distance from  
basic facilities**

2.10 The explanatory text to Policy CB13 sets out the evidence base for the adoption of an energy hierarchy based approach. In terms of minimising energy demand a “fabric first” approach is promoted in meeting the building-by-building requirement for a 19% carbon reduction improvement over Part L of the Building Regulations (2013). This requirement applies to both new dwellings and new non-residential floorspace.

2.11 The following plan demonstrates the extent to which the Grange area would be within 400m of its local centre. While not covered in its entirety, much of the housing land (including that of higher density) is identified within the 400m radius. This further evidences the sustainable credentials that the Council are seeking to build into the plan.



<p>2.12 <b>Is the requirement for an energy standard above Building Regulations justified?</b></p> <p>2.13 The Government is currently consulting on the introduction of the Future Homes Standard in 2025. This is a key means of working towards the national Net Zero 2050 target. The proposals also include introducing a meaningful but achievable uplift to energy efficiency standards in 2020 as a stepping stone to the Future Homes Standard.</p> <p>2.14 The Future Homes Standard will have very high fabric standards. It will mean every new home should typically have triple glazing and standards for walls, floors and roofs that significantly limit any heat loss. In addition to a high level of fabric efficiency the Government proposals are that a low carbon heating system is integral to the specification of the Future Homes Standard.</p> <p>2.15 Two options to strengthen the energy efficiency standards in 2020 are put forward. The first option is a 20% improvement on carbon dioxide emissions with the expectation that this would be delivered predominantly through an increased fabric standard. This increased fabric standard would typically be achieved through measures such as triple glazing and a waste water heat recovery system. The second option would result in a 31% improvement on carbon dioxide emissions, which we expect would typically be delivered through a more minor increase to fabric standards, alongside use of low-carbon heating and/or renewables. The consultation document makes it clear that the Government’s preference is for the second option.</p> <p>2.16 Both options outlined however deliver a greater improvement in carbon dioxide emissions than the 19% improvement on the 2013 Part L</p>	<p><b>Q188 - Requirement for energy standard</b></p>
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<p>requirements which was proposed as the minimum on-site energy efficiency requirement of the former Zero Carbon Homes policy. In this context the requirement in terms of energy efficiency in Policy CB13 is considered to be entirely justified and, if anything, underplays the likely forthcoming tightening of the standards in part L. On this basis a main modification is suggested that addresses the fabric first component of component of part 2 of this policy. This is set in more detail at the end of this Issue</p> <p>2.17 It is anticipated that low carbon will be delivered through heat pumps, heat networks and in some circumstances direct electric heating. The current consultation makes it clear that the Government’s expectation is that heat networks will have a strong role to play in delivering low carbon heat to new homes in future.</p>	
<p>2.18 <b>How will a low carbon town model be delivered?</b></p> <p>2.19 The market engagement process will help to understand the industry appetite to invest in supporting the ongoing roll out of district heating networks to serve the Cranbrook expansion areas. The study will also identify any requirement for capital grant funding support. This includes in terms of the Government’s Heat Network Investment Programme (HNIP).</p> <p>2.20 This is a £320m programme which is being made available in recognition of the potential for heat networks to assist the UK in achieving a clean and cost effective transition to a low carbon economy.</p> <p>2.21 The Council has a track record of working proactively to secure the roll out of district heating networks. This includes investing directly to secure</p>	<p><b>Q189 – Delivery of low carbon model</b></p>

the network to service the first phases of Cranbrook as part of package of £4.1m of grant support. The Monkerton network, which straddles the M5 and serves circa 4,200 homes between Exeter and East Devon as well as Exeter Science Park, was secured on a purely commercial basis with no grant aid. This was a business to business contract between the various landowners/developers and energy company Eon. Here the Council played a brokerage role to bring the key parties together and ensure that a successful outcome was secured.

2.22 In terms of securing the roll out of district heating to serve the Cranbrook expansion areas, and learning from previous experience, it is anticipated that the Council will play three main roles;

- Market engagement through the techno-economic study
- Brokerage between the main developer/landowner parties and potential energy supply companies to help secure the necessary contractual agreements
- Bidding for capital funding support from the Government's HNIP programme to help secure a zero carbon solution

2.23 A flexible and agile strategy will be required which achieves the vision for zero carbon development and is able to take advantage of new technologies as and when they come on stream. Ultimately this is a defining advantage of decentralised energy networks as it overcomes the need to retrofit individual homes.

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2.24 **Is the conversion of the existing CHP facility to renewable fuels realistic or achievable?**

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<p>2.24 The section 106 agreement for the Energy Centre for the district heating network at Skypark includes an obligation for a solid biomass Combined Heat and Power plant capable of producing 2MW electric and 2.4MW thermal output. This facility was scaled on the basis of providing zero carbon heat and power for the first 2,900 homes at Cranbrook. The trigger for commissioning this plant was the point that 2,000 homes were occupied at Cranbrook. This trigger has now been exceeded but the CHP plant has not been commissioned. The Council accepts that the technology that was originally anticipated as providing for these electrical and thermal outputs (pyrolysis and gasification) has not matured sufficiently in the intervening decade since the s.106 agreement was signed as to provide a robust and reliable solution at present.</p> <p>2.25 This is not to say that the ambition to ensure that the district heating networked is powered by a zero carbon energy source is in any way diminished. This is particularly the case given the greater scale of development now anticipated by the DPD which would act to make zero carbon energy sources more viable. It is also important to bear in mind that a district heat network powered by gas is more efficient and lower carbon than individual boilers. The provision of the below ground infrastructure and connection to each property enables future renewable heat sources to be used collectively in a way that cannot be achieved without such infrastructure being in place. Future proofing the town in this way is vital if emerging technologies are to be utilised in the future.</p> <p>2.26 The Council has received funding from the Heat Network Delivery Unit of the Department for Business, Energy and Industrial Strategy to undertake a detailed techno-economic study to create a framework for achieving zero carbon development for Cranbrook/Skypark and to provide a clear pathway for supporting the large scale delivery of zero carbon development that will ultimately comprise around 8,000 homes and 1.4 m</p>	<p><b>Q190 - Conversion of existing CHP facility</b></p>
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<p>sq. ft. of commercial space. The Council has recently commissioned WSP to undertake this work which will complete in April 2020.</p>	
<p><b>2.27 How might this policy hinder the delivery of otherwise policy compliant development in advance of infrastructure delivery?</b></p> <p>2.28 The Council do not consider that this policy will hinder otherwise policy compliant development. This policy is essential to the delivery of a radical reduction in greenhouse gas emissions in line with the objectives of the NPPF and is also consistent with the direction of travel of the Future Homes Standard.</p> <p>2.29 The Council has demonstrated that it is prepared to work proactively to secure the policy objectives including in terms of securing funding. The Council has also worked to broker effective working relationships between developers and the energy company and to ensure that the roll out of district heating networks and associated connections is not a brake on the pace of development.</p> <p>2.30 The experience with development at both Cranbrook and Monkerton/Redhayes, where there are now approaching 3,000 homes connected to district heating networks has helped to demonstrate this</p>	<p><b>Q191 - Delivery of development in advance of infrastructure</b></p>
<p><b>2.31 Are any Main Modifications proposed in relation to Issue 23?</b></p> <p>1. Paragraph 2b of Policy CB13 amended to read:</p> <p>2.32 Achieving a minimum 19% carbon reduction improvement over Building Regulations Part L (2013) on a building by building basis through fabric</p>	<p><b>AQ23 – Main Modification</b></p>



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<p>energy efficiency measures and on plot renewable energy generation, with preference being for the “fabric first” approach <b>unless Part L is subsequently superseded by a more robust fabric First requirement, in which case compliance with the revised standard will be expected</b></p>	
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## Issue 24: Safeguarding land for energy uses

Response	Inspectors Question(s)
<p>3.1 <b>What is the delivery mechanism for the alternative low carbon and renewable energy facility envisaged through policy CB14?</b></p> <p>3.2 In terms of securing the roll out of district heating to serve the Cranbrook expansion areas, and learning from previous experience, it is anticipated that the Council will play three main roles;</p> <ul style="list-style-type: none"> <li>• Market engagement through the techno-economic study</li> <li>• Brokerage between the main developer/landowner parties and potential energy supply companies to help secure the necessary contractual agreements</li> <li>• Bidding for capital funding support from the Government’s HNIP programme to help secure a zero carbon solution</li> </ul> <p>3.3 The output of the current feasibility study will be an important step in defining a clear pathway to zero carbon development and the associated choice and mix of technologies that will need to be employed. In turn this will define the role that the Council needs to play and the use to which the safeguarded land will need to be put.</p>	<p><b>Q192 - Delivery mechanism</b></p>
<p>3.4 <b>Should there be flexibility included within policy CB14 regarding safeguarded land should alternative provision not be delivered?</b></p> <p>3.5 A flexible and agile strategy will be required which achieves the vision for zero carbon development and is able to take advantage of new</p>	<p><b>Q193 - Flexibility of safeguarded land</b></p>

<p>technologies as and when they come on stream. Ultimately this is a defining advantage of decentralised energy networks as it overcomes the need to retrofit individual homes.</p> <p>3.6 Policy CB14 safeguards land in order to provide to help ensure this flexibility and agility. At present, and in advance of the completion of the detailed feasibility study, it is not possible to say as to what precise use this land will be put. This could include a range of possibilities, from a biomass fuelled Combined Heat and Power plant/energy centre to a large scale inter-seasonal thermal store, depending upon on the choice and mix of technologies employed.</p> <p>3.7 In a commercially driven model it is essential to avoid the creation of hope value for alternative higher value uses. Therefore the Council does not believe that the addition of flexibility to this policy in terms of alternative uses would in any way be beneficial and is only likely to frustrate the achievement of the vision for delivery zero carbon development.</p>	
<p>3.8 <b>AQ24. Are any Main Modifications proposed in relation to Issue 24?</b></p> <p>3.9 No main modifications are proposed in relation to this issue.</p>	<p><b>AQ24 - Main modification</b></p>

## Issue 25: Suitable Alternative Natural Green Space (SANGS)

Response	Inspectors Question(s)
<p>4.1 <b>Is the SANG funding for maintenance justified and effective, given other green space does not attract funding?</b></p> <p>4.2 Yes - Discussions with Natural England has highlighted that the SANGS are appropriately located, of a suitable size and can demonstrate appropriate attributes, to attract people away from the sensitive habitats of the Pebblebed Heaths and Exe Estuary, providing alternative natural green space in which to undertake the various recreational activities.</p> <p>4.3 By providing direct funding linked to residential development this approach is considered justified and effective and will have a direct benefit of reducing the pressures which would otherwise affect the designated sites and in so doing prevents the adverse effects.</p> <p>4.4 As is the case with other mitigation Strategies across the UK (see : Thames Basin Heaths<sup>2</sup>, Solent<sup>3</sup>, Dorset<sup>4</sup>, North Kent<sup>5</sup>, East Suffolk<sup>6</sup>) Natural England's advice to Local Planning Authorities includes the</p>	<p><b>Q194 - Maintenance funding</b></p>

<sup>2</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/documents/thames-basin-heaths-spa-supplementary-planning-document.pdf> (3.1.5 pg. 12).

<sup>3</sup> [https://solent.birdaware.org/media/29372/Bird-Aware-Solent-Strategy/pdf/Solent\\_Recreation\\_Mitigation\\_Strategy.pdf](https://solent.birdaware.org/media/29372/Bird-Aware-Solent-Strategy/pdf/Solent_Recreation_Mitigation_Strategy.pdf) (1.5, pg. 5).

<sup>4</sup> <https://www.bournemouth.gov.uk/planningbuilding/PlanningPolicy/PlanningPolicyFiles/HeathlandSPDOct2015/Dorset-Heathlands-SPD-Oct-2015.pdf> (4.5, pg. 6).

<sup>5</sup> [https://www.medway.gov.uk/downloads/file/1834/strategic-access-and\\_recreationmanagementplan\\_2.11](https://www.medway.gov.uk/downloads/file/1834/strategic-access-and_recreationmanagementplan_2.11), pg.16)

<sup>6</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf> (7.8-7.9, pgs. 57-58).

requirement to ensure that mitigation of likely significant effects as identified in Appropriate Assessments (required under the Conservation of Species and Habitats Regulations, 2017) is provided in perpetuity. This is necessary in consideration of the lifetime impacts of development, also discussed in the South East Devon European Site Mitigation Strategy<sup>7</sup>.

4.5 The delivery and ongoing maintenance of SANGS is one of the measures required to mitigate the likely significant effects identified in the Cranbrook Appropriate Assessment. To meet the requirements of legislation, SANGS provision and maintenance is defined priority 1 infrastructure. With the advice from Natural England to ensure mitigation in perpetuity, due importance is placed upon ensuring certainty in respect of ongoing SANGS maintenance. Other greenspace is not required to fulfil the same function or meet the same criteria and therefore does not attract the same ongoing funding.

4.6 The Cranbrook Plan SANGS Delivery Strategy<sup>8</sup> refers to the expectation that SANGS are designed in accordance with an overarching implementation plan which has previously been agreed with the Council. Oversight of this plan by the Council will ensure that the design and requisite maintenance of the site in perpetuity is effective in delivering mitigation by adhering to widely adopted SANGS criteria guidance as provided by Natural England<sup>9</sup>.

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<sup>7</sup> <https://eastdevon.gov.uk/media/369997/exe-overarching-report-9th-june-2014.pdf> (5.20, pg. 103)

<sup>8</sup> <https://eastdevon.gov.uk/media/2763282/sangs-strategy.pdf> (2.11, pg.5)

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<https://www.surreyheath.gov.uk/sites/default/files/Thames%20Basin%20Heaths%20Special%20Protection%20Area%20SPD%202019.pdf> (Appendix 2 pg.31)

<p>4.7 <b>Should the policy require that paths within SANGs retain a natural character? If so, should the policy be amended to make this clear?</b></p> <p>4.8 Statement of common ground agreed with Natural England which agrees to Amend clause (h) of Policy CB15 to read:</p> <p>4.9 ‘Paths that <b>retain a natural character</b> are suitably signposted and available for use in all weathers all year round (this can include the introduction of boardwalks in wet sections);’</p>	<p><b>Q195 - Natural character of paths</b></p>
<p>4.10 <b>How might the length of SANG walks be addressed given that at 2.3km falls short of the recognised length of 2.5km length walks identified in the HRA?</b></p> <p>4.11 Guidelines publically available including advice from Natural England to other Councils on the creation of Suitable Accessible Natural Green Space state that it should be possible to complete a circular walk of 2.3-2.5km around the SANGS.</p> <p>4.12 The SANGS that will be delivered as part of the expansion areas around Cranbrook will be no shorter than the minimum requirement and with the use of adjacent green corridors can in some cases exceed the 2.5km requirement.</p> <p>4.13 Natural England have accepted this approach in the Statement of Common Ground.</p>	<p><b>Q196 - Length of walks</b></p>

<p>4.14 <b>To what extent is the SANG policy compliant with the EDLP policies 47 and 10?</b></p> <p>4.15 The approach taken towards SANGS in the Plan complies with both the HRA and the South-east Devon European Site Mitigation Strategy. Each designated SANG are accessible and in most cases are within a 400m catchment of the expansion area they support and yet close enough to each other to provide an effective network for users to enable longer trips.</p> <p>4.16 In addition individually it has been agreed with Natural England that they provide walks of sufficient length in a semi-natural landscape with plenty of variation which will ensure that the functionality of these SANGS and their contribution to the avoidance of a likely significant effect has been clearly demonstrated in line with Strategy 10 of the East Devon Local Plan.</p> <p>4.17 The SANGS Strategy recognises 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.</p> <p>4.18 The SANGS availability with the Delivery Strategy had been updated following discussions with Natural England and is included in the SOCG.</p> <p>4.19 There is clearly an overprovision of SANGS within Cranbrook and such an approach allows for developers to bring forward land that is appropriate to their needs as well as identifying additional land which could be used to help meet the small shortfall from developers who have no such direct control. Overall it is considered that the implementation of</p>	<p><b>Q197 - Compliance with East Devon Local Plan</b></p>
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<p>the Policy and accompanying strategy demonstrates that the Plan as a whole is compliant with Strategy 47 of the East Devon Local Plan.</p>	
<p>4.20 <b>To what extent is there justification for the SANG to be in place prior to first occupation of the dwellings?</b></p> <p>4.21 Discussions with Natural England around phasing highlighted their preference for the supporting text to Policy CB15 to explicitly state that SANGS should be in place before recreational impacts occur. The Statement of Common Ground agreed with Natural England shows an amendment of paragraph 3.53 to read:</p> <p>4.22 Set out in more detail in Policy CB15 and the associated supporting text, it is critical to the phasing of development that SANGS is delivered in a timely fashion and must be in place and be of a suitable quality before first occupation of dwellings in each phase or sub phase to ensure they are in place before recreational impacts occur.</p>	<p><b>Q198 - Justification of delivery</b></p>
<p>4.23 <b>Should SANGS be within or adjacent to the Clyst Valley Regional Park in order to be compliant with the HRA approach?</b></p> <p>4.24 The HRA conclusion is that the South-East Devon Mitigation Strategy provides the necessary framework for mitigating for recreation pressure, but that there should be some strengthening of policy, supporting text and the Cranbrook SANGS delivery document to give greater confidence in securing the necessary measures.</p>	<p><b>Q199 - Clyst Valley Regional Park</b></p>



4.25	<p>The Council has liaised with Natural England to agree strengthened policy wording and supporting text around SANGS to ensure that they are delivered and are in place before recreation impacts occur.</p>	
4.26	<p>Whilst the Clyst Valley Regional Park is part of the overarching strategy for mitigation in East Devon, the Councils view is that due to the concentration and size of development at Cranbrook it is important that the SANGS that are delivered are readily accessible to new occupants compliant with Natural England guidance of being within a 400m catchment of the expansion area they support.</p>	
4.27	<p>A masterplan for the Clyst Valley Regional Park is in production and that this will propose some extensions of the Clyst Valley Regional Park policy boundary to include the proposed Cranbrook SANGS.</p> <p>The Council are satisfied that the approach set out is legally compliant with the Habitat approach.</p>	
4.28	<p><b>To what extent should the level of SANGS contribution for a site (for example Farlands) be based on existing use value of the alternative land on which it will be provided together with an amount sufficient to accommodate any necessary modification and maintenance thereafter?</b></p>	<p><b>Q200 - Existing use value</b></p>
4.29	<p>SANG land value is discussed in Cran063 para 4.2.9. SANG land is provided as a legal requirement and as such is not development land.</p>	
4.30	<p>It has no alternative use (unlike other non-residential space provision within the planned development) and this justifies a different value for the 78 SANG hectares.</p>	

<p>4.31 Differential rates for SANG land have also been accepted as part of s106 negotiations elsewhere.</p> <p>4.32 Financial component necessary to secure both site start-up costs and future maintenance are both addressed through the Cranbrook IDP. While the IDP demonstrates an equalised approach to costs, both these costs are ascribed as Category 1 as they are already consider equal and required from all developers.</p>	
<p>4.33 <b>To what extent should the reliance on other areas for SANG provision be avoided unless a mechanism of compensation/payment exists?</b></p> <p>4.34 Overall the plan provides an excess provision of SANGS of approximately 22ha and all of the major landowners can provide their requirement on site.</p> <p>4.35 Natural England are clear in their statement of common ground that this provision is adequate both in terms of quantity and quality.</p> <p>4.36 Where landowners of small sites cannot provide SANGS directly they will either have to come to an arrangement with a landowner with excess provision, make alternative provision elsewhere or agree an off-site contribution for the Council to acquire necessary land.</p>	<p><b>Q201 - Reliance on other areas</b></p>
<p>4.37 <b>Should the wider green infrastructure strategy to which EDDC is committed be provided prior to the implementation of the expansion areas in the plan?</b></p>	<p><b>Q202 - Green Infrastructure Strategy</b></p>

<p>4.38 A masterplan for the Clyst Valley Regional Park is in production and is expected to be released as a draft for public consultation in spring 2020. The masterplan will set out the detail of green infrastructure delivery across the whole Cranbrook DPD area and surrounding parishes of Whimple, Broadclyst, Rockbeare, and Clyst Honiton.</p> <p>4.39 This masterplan therefore obviates the need for the district-wide green infrastructure strategy to be published prior to implementation of the Cranbrook expansion areas.</p>	
<p>4.40 <b>AQ25. Are any Main Modifications proposed in relation to Issue 25?</b></p> <p>4.41 Yes - Statement of common ground agreed with Natural England which agrees to Amend clause (h) of Policy CB15 to read:</p> <p>4.42 'Paths that retain a natural character are suitably signposted and available for use in all weathers all year round (this can include the introduction of boardwalks in wet sections);'</p>	<p><b>AQ25 - Main modification</b></p>

### **Appendix 1: Extract from Mario Wolf Presentation**

The following slides are taken from a presentation given by Mario Wolf, the Director of the Right to Build Task Force to the ROOM@RTPI: "Living By Numbers": The Unintended Consequences of Housing Delivery Conference on 14 November 2019 at Somerset County Cricket Ground, Taunton [[RTPI SW Previous Event Details](#)]

[https://www.rtpi.org.uk/media/3533411/mario\\_wolf.pdf](https://www.rtpi.org.uk/media/3533411/mario_wolf.pdf)



Slide 1

## **The Good: Examples of policies - Garden Settlements**

- *East Devon (Policy CB12 Cranbrook Custom and Self Build Housing) – not less than 4% of homes in each Expansion Area must be delivered as custom and self-build plots in accordance with agreed phasing strategy. Delivery must include affordable housing plots.*
- *Where Council can demonstrate that demand is higher, delivery must meet identified demand unless a development is proven to be unviable.*
- *Plots must be actively marketed to individuals and custom build companies (as appropriate) and reasonably priced to reflect prevailing market conditions. A marketing and pricing strategy shall be agreed in writing in advance.*
- *Carlisle (St. Cuthbert's Garden Village) – ambition to support Custom and Self Build, looking at how best practice examples can be drawn upon to develop specific policy.*

Slide 21