

Independent Examination of the Cranbrook Local Plan

MATTERS AND QUESTIONS

RESPONSE by NATURAL ENGLAND

7 January 2020

There are no outstanding issues between the Council and Natural England as set out in a statement of common ground between the two parties (Natural England response to matter 2, annex 1).

Where the Inspector has raised specific questions relating to matters that are now resolved (as set out in the statement of common ground) these are addressed under matter 2 (Q31), matter 7 (Q115) and matter 16 (Q195, Q196 & Q198).

The Inspectors questions addressed in this document are shown in bold.

Matter 16 – Subject Specific Policies (1)

Issue 25:

Is the policy for Suitable Alternative Natural Green Space (SANGS) CB15 justified and effective?

Q195. Should the policy require that paths within SANGs retain a natural character? If so, should the policy be amended to make this clear?

Natural England advise that paths should remain unsurfaced to retain a natural character and avoid the site becoming urban in feel. Otherwise they could fail in their function to operate as a suitable alternative green space. The Council have agreed to amend clause (h) of policy CB15 to this effect as set out in the statement of common ground between the Council and Natural England.

Q196. 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? Natural England advise that it should be possible to complete a circular walk of between 2.3 – 2.5 km around SANGs. This has been the advice provided to other planning authorities¹.

Q198. To what extent is there justification for the SANG to be in place prior to first occupation of the dwellings? Provision of SANGs reflects the need to ensure there is no adverse effect arising as a result of recreational disturbance on the integrity of the Exe Estuary Special Protection Area (SPA) and Ramsar site and the

¹ Guildford Borough Council, Thames Basin Heaths SPA avoidance strategy 2017, SPD July 2017. Appendix 4 – Natural England guidelines for the creation of SANG & Appendix 3 – Natural England response. [Special Protection Area \(SPA\) - Guildford Borough Council](#)

East Devon Pebblebeds Heaths SPA/Special Area of Conservation (SAC). This is addressed in Plan policy CB15 and accompanying text.

To ensure there is no adverse effect on the integrity of European sites it is important that mitigation is in place before the impacts occur. Therefore it is important that SANGs are in place prior to first occupation of the dwellings. The Council have agreed to insert wording to this effect in para 3.53 as set out in the statement of common ground between the Council and Natural England.