

Date: 24th February 2022

Our ref: 380536

Your ref: Cranbrook Plan - Proposed Main Modification consultation



The Cranbrook Plan
Planning Policy
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BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Cranbrook Plan - Proposed Main Modification consultation.

Thank you for your consultation on the above dated 17th January 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We welcome the following proposed main modifications - MM21, MM33, and PM11 - and we are pleased to see that the changes to the respective policies, as set out in the statement of common ground prepared between East Devon District Council and Natural England (Matter 2 Written Statement – Natural England), have been included in the modification schedule.

Whilst we understand that the authority are not inviting comments on the minor proposed modifications, we feel it is necessary to communicate our dismay that the minor changes that were agreed, in the statement of common ground between East Devon District Council and Natural England, have not been included in the Full version of the Cranbrook Plan that incorporates the PMMs together with the minor modifications.

More specifically, the changes to paragraph 3.53 (now paragraph 3.58), paragraph 4.87 (now paragraph 4.89), and the amendment to the last 'indicator and target' relating to SANGS in the table of key monitoring indicators within paragraph 5.2. The agreed changes, whilst minor and

not directly relating to the Plan Policies or Map, would improve the effectiveness of the Plan in delivering positive outcomes for the natural environment.

The amendment agreed for paragraph 3.53 (now 3.58) would have provided a clear explanation of the reasons for delivering SANGs prior to the occupation of the dwellings, which the proposed minor additional modification does not.

The amendment agreed for paragraph 4.87 (now 4.89) would better reflect the requirement for net gain as set out in NPPF para 174(d).

The amendment agreed for the SANGs monitoring indicator would result in more meaningful monitoring data by providing a regular record of progress, in particular regarding the monitoring of housing completions against SANG delivery.

Sustainability Appraisal of the Proposed Main Modifications

Natural England has no specific comments to make on the Sustainability Appraisal update.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Stephanie Parker-Stephenson on [REDACTED] or [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Stephanie Parker-Stephenson
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Devon, Cornwall & Isles of Scilly Area Team
Natural England