



Devon Countryside Access Forum

Lucombe House
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Ian Kemp
Programme Officer
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6 January 2020

Dear Mr Kemp

Cranbrook Local Plan Examination

Further to its previous submission, the Devon Countryside Access Forum wishes to submit statements related to SANGs issues raised in the Inspector's Matters, Issues and Questions. SANGs matters were included in the Devon Countryside Access Forum's original submission.

Each question is dealt with on a separate sheet and these are attached. These relate to:

Question 194

Is the SANG funding for maintenance justified and effective, given other green space does not attract funding?

Question 195

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

Question 201

To what extent should the reliance on other areas for SANG provision be avoided unless a mechanism of compensation/payment exists?

I should be grateful if you confirm receipt.

Yours sincerely



Hilary Winter
Forum Officer

*Letter sent on behalf of the Devon Countryside Access Forum
Chair: Sarah Slade
Vice-Chair: Chris Cole*



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Q194: Is the SANG funding for maintenance justified and effective, given other green space does not attract funding?

The DCAF is of the strong opinion that funding for SANGs is essential and fully justified in order to be effective in providing quality green space that is enjoyed by residents of Cranbrook. If areas are not maintained, they quickly deteriorate or scrub over and cease to be well-used. If the intention is to relieve pressure on internationally designated habitat sites, such as the Pebblebed Heaths, the Exe Estuary and Dawlish Warren, the SANGs area of green space needs to be sufficiently well-maintained in order to attract people to use it.

Whilst other green spaces may be maintained by the public sector or private landowners, this does put pressure on stretched budgets and can mean a continual cycle of grant applications which may be unsuccessful. In addition, SANGs sites can be larger than many other green space areas. Funding for SANGs maintenance provides surety for the future and means a cycle of work can be planned.

Strategic policy CB15, Delivery of Suitable Alternative Natural Green Space, should retain a commitment to ensuring SANGs maintenance in perpetuity.

The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CROW Act). Its statutory remit is to give independent advice “as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area...” Section 94(4) of the Act specifies bodies to whom the Forum has a statutory function to give advice and this list includes district councils and the Planning Inspectorate.

The DCAF currently has fifteen members, appointed by Devon County Council, who represent the interests of landowners/managers, access users and other relevant areas of expertise such as conservation and tourism.

The Devon Countryside Access Forum is a local access forum. It is required, in accordance with Sections 94 and 95 of the Countryside and Rights of Way (CROW) Act 2000, to provide advice as to the improvement of public access to land for the purposes of open-air recreation and enjoyment.



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

Members of the DCAF visited the Dawlish SANGs site and appreciated the natural character. Paths should, wherever possible, retain a natural character and not be an urban extension of the development. There may be areas where the surface needs to be harder, for example at pinch points or at eroded sections, but this can still be done in a way that has a minimal landscape impact. Ensuring accessibility for users and providing a natural environment should not be mutually exclusive.

Strategic policy CB15, Delivery of Suitable Alternative Natural Green Space, should be amended to make this more explicit.

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Q201: To what extent should the reliance on other areas for SANG provision be avoided unless a mechanism of compensation/payment exists?

The development at Cranbrook and its proximity to sensitive habitats means that SANGS needs to be provided near to the housing which is likely to result in increased pressure on vulnerable areas. A mechanism for compensation, and payment for maintenance, is essential as people are very unlikely to travel to other SANGs sites elsewhere. From Cranbrook this would involve travel to Dawlish Country Park SANGs, a distance of about twenty miles on roads that can be congested. It is therefore important to ensure properly funded SANGs provision close by and avoid reliance on other areas. Travelling considerable distances to SANGs sites by car cuts deeply into the rationale for their existence.

Policy GB15 includes the statement “Only where it is wholly impractical to meet the definitions, should off-site delivery or an off-site financial contribution be required.” This suggests that off-site delivery could be an option allowing delivery that is not directly related to Cranbrook itself. This part of the policy is ambiguous and lacks clarity.

Strategic policy CB15, Delivery of Suitable Alternative Natural Green Space, should retain a commitment to ensuring SANGs maintenance in perpetuity and for soundness the section about off-site delivery should be removed. The policy should be amended to include a statement about compensation/payment to ensure acquiring land on-site for SANGs is more likely to be an achievable and deliverable commitment.

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