

PLANNING STATEMENT

1 & 2 TILLHOUSE COTTAGES, LONDON ROAD, ROCKBEARE, CRANBROOK, EX5 2EE



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1.0 INTRODUCTION

1.1 Scope of the Report

1.1.1 Greenslade Taylor Hunt has prepared this Planning Statement by on behalf of Mr Phillip and Mrs Julie Trump. It supports the submission of a full planning application for the proposed demolition of the existing semi-detached cottages and the erection of five dwelling with associated access and landscaping at 1 & 2 Tillhouse Cottages, London Road, Rockbeare, Cranbrook, EX5 2EE.

1.1.2 The application is accompanied by the following suite of plans and technical documents.

Plans and documents	Prepared by
Location Plan, Existing Site Plan, Existing Elevations and Floor Plans, Proposed Site Plan, and Proposed Elevations and Floor Plans	Greenslade Taylor Hunt
Planning Statement (this document)	Greenslade Taylor Hunt
Ecological Assessment Report and Biodiversity Net Gain Report	Redstone Ecology
Project Design for an Archaeological Trench Evaluation	AC Archaeology
Arboricultural Impact Assessment	Clark Landscape Design
Highways Technical Note	Advance Consulting Engineers Ltd
Drainage Strategy and Water Quality Assessment	Enviren

1.1.3 These documents form part of the content of the planning application for the proposed development together with the statutory application form and certificates.

1.1.4 This statement provides an appraisal of the site and its broader context, followed by a description of the proposed development with reference to access and design. It then goes on to assess the proposals against relevant local and national planning policies. The planning case is then made and conclusions provided, demonstrating the conformity of the proposals with the development plan policies and that the proposals constitute a sustainable form of development.

2.0 THE APPLICATION SITE

2.1 The Site

- 2.1.1 The 0.2ha (0.54 acre) site comprises semi-detached cottages with gardens, facing London Road in the town of Cranbrook.
- 2.1.2 The exterior of the cottages consist of a cream render with concrete roof tiles and white uPVC windows and doors. The dwellings are adjoined by a single storey brick outbuilding with a corrugated roof to the east which provides external storage.
- 2.1.3 Other dwellings surround the site to the north, east and west, with London Road to the south. The site is bound by a mix of boundary fencing and vegetation.

2.2 Site Context

- 2.2.1 The site is located within the east part of the Cranbrook masterplan, and is situated approximately 4 km northeast of Exeter. It is a predominantly but not wholly residential location.
- 2.2.2 The site adjoins the B3174 to the south which provides connections to Exeter to the west and Honiton to the east via the A30. Sustainable transport links close to the site include Cranbrook Train station and multiple bus stops throughout the Cranbrook development which provide connections to Exeter and Honiton.
- 2.2.3 The site benefits from being located in close proximity to the approved town centre of Cranbrook and forming part of the London Road Commercial and Retail allocation which encourages development along London Road to form a new high street.
- 2.2.4 The site is not located within any statutory environmental designations such as a National Landscape or a Site of Special Scientific Interest (SSSI).
- 2.2.5 The existing dwellings are not listed and there are no designated heritage assets within the immediate vicinity. Moreover the site is not located within a conservation area nor an Area of High Archaeological Potential (AHAP). The site does however fall within the zone of interest stemming from the putative route of the former Roman road from Exeter to Honiton. The site lies adjacent to and north of the route which is understood to follow the present day London Road.

- 2.2.6 The Environment Agency (EA) Flood Map for Planning has demonstrated that the site is located wholly within Flood Zone 1 and is therefore identified as being on land at the lowest risk of coastal and fluvial related flooding. The EA flood mapping has identified a small pocket of low (1 in 1,000yr) surface water flooding along the London Road and a small section of the site's frontage. Accordingly, flood risk does not pose a significant constraint to development.

3.0 PROPOSED DEVELOPMENT

3.1 Proposal

- 3.1.1 The application seeks permission for the proposed demolition of the existing dwellings and the erection of five new dwellings with associated access and landscaping, resulting in a net gain of three dwellings.
- 3.1.2 Given the site's location within an area allocated for retail and commercial growth, due consideration has been given to future-proofing the site and creating scope for the ground floors of the dwellings to be converted to retail uses in future, retaining the second floors as dwellinghouses. Such considerations have taken the form of ensuring the dwellings are orientated to ensure frontages face London Road save for Unit 3 which provides overlooking of the proposed access and a sense of arrival.
- 3.1.3 The dwellings would consist of one four bed detached dwelling in the west of the site, two semi-detached two bed dwellings in the middle and another two semi-detached three bedroom dwellings to the east side.
- 3.1.4 The dwellings are situated along London Road, with units 1, 2, 4, and 5 having their principle elevation facing south along the road, whilst unit 3 has its principle elevation facing east.
- 3.1.5 The proposal includes vehicular access off London Road serving parking and turning areas to the north of the site. Each dwelling has some garden to its front but with the principal garden area to the north.
- 3.1.6 The proposal would include improvement to the highway adjoining the site to help contribute towards the enhancement of the public realm in this location. This would include establishing new footpaths along London Road to create a more pedestrian-friendly environment to accommodate the planned high street. Without this development it would not be possible to achieve this enhancement to connectivity and sustainability.

3.1.7 The exterior of the buildings consist of brick with slate tile roofing, mirroring the architectural style and materiality of the surrounding dwellings. The windows and doors will be made using white uPVC, again matching that of the neighbouring dwellings.

3.1.8 The site will retain vegetation where practicable and will benefit from new boundary planting and trees, resulting in a softer, higher quality and more landscaped appearance than at present.

4.0 PLANNING HISTORY & PRE-APPLICATION CONSULTATION

4.1 Planning History

4.1.1 A review of the Council online planning register has identified no planning application history for the site.

4.2 Pre-application Enquiry: 20/0163/PREAPP

4.2.1 A pre-application enquiry was submitted to East Devon District Council on the 25th March 2021 for the erection of three dwelling within the curtilage of 1 & 2 Tillhouse Cottages with associated access. The subsequent written pre-application response stated how the site technically fell within open countryside and therefore was subject to Strategy 7 of the East Devon Local Plan. However, due to the site's proximity to the Cranbrook development in regard to the settlement boundary and amenities, it was considered to be in a sustainable location for in-fill development.

4.2.2 The officer suggested the following considerations to help the application align with the policies within the Local Plan and the now adopted Cranbrook Development Plan which was emerging at the time of the advice being provided;

- Integrate bird and bat boxes into the prosed new dwellings to help created new habitats on the site to boost the ecology of the surrounding area.
- Connect the site to the expanding District heating Network to ensure the site aligns with Strategies 12 and 40 of the Local Plan.
- Ensure the dwellings are suitable for conversion into commercial spaces to align with the policies map for retail and commercial spaces.

- The site would not be subject to CIL, instead, the developer would make contributions via a S106 agreement as necessary.
- An Archaeological Assessment may be required due to the historic route of London Road following consultation with a County Archaeologists.

4.2.3 The officer concluded that the principle of development was acceptable due to the site's proximity to the new town of Cranbrook, finding that the proposal represents sustainable development with good accessibility to services and facilities.

4.2.4 It was encouraged that the design of the dwellings allow for the easy conversion of the units for commercial and retail uses to align with policy CB23 (London Road Commercial and Retail proposals). Additionally, the officer found it important that the proposal demonstrates high quality design, reflecting the character of the surrounding buildings, and the layout of the site protects the residential amenity of the neighbouring properties.

5.0 Planning Policy Context

5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In effect, this establishes a presumption in favour of granting planning permission for developments which are in accordance with the development plan.

5.1.2 The following describes the relevant national and local policies of relevance to the application.

5.2 National Planning Policy Framework (2023)

5.2.1 The revised National Planning Policy Framework (NPPF) was published in December 2023 and is a material consideration when assessing planning applications. It sets out the Government's planning policies for England and how these are expected to be applied.

- 5.2.2 At the heart of the NPPF is a ‘presumption in favour of sustainable development’. Paragraph 11 says that plans and decisions should apply this presumption in favour of sustainable development. In terms of decision-taking this means “approving development proposals that accord with an up-to-date development plan without delay”.
- 5.2.3 In terms of rural housing, paragraph 83 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.
- 5.2.4 Paragraph 115 is clear that developments should only be prevented or refused on highways ground if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.2.5 Paragraph 123 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 5.2.6 Paragraph 157 states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
- 5.2.7 Paragraph 168 relates to the sequential test. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 5.2.8 Paragraph 173 explains that, when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:
- a) Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;

- b) The development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- c) It incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) Any residual risk can be safely managed; and
- e) Safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

5.2.9 Chapter 15 sets out the Government's commitment to enhancing the natural and local environment. This can be achieved by minimising impacts on and providing net gains for biodiversity.

5.3 The Local Development Plan

5.3.1 In this case the development plan currently consists of the East Devon Local Plan (2013-2031) which was adopted in January 2016. The following policies are considered to be of relevance to the proposal

5.3.2 Strategy 1 (Spatial Strategy for Development in East Devon) sets out the district's planned provision for development across East Devon. The Strategy states that 17,100 new homes and around 150 hectares employment land to be delivered within the plan period. The Strategy states that the seven main towns will accommodate significant residential development and major employment development. With the smaller towns, villages and rural areas, development will be geared towards meeting local needs.

5.3.3 Strategy 2 (Scale and Distribution of Residential Development) confirms that future development across the plan period will be accommodated in line with the pattern of distribution detailed in the policy table.

5.3.4 Strategy 3 (Sustainable Development) states that the council will support proposals which demonstrate sustainable development through the careful balance of social, environmental, and economic considerations.

5.3.5 Strategy 5 (Environment) promotes that development proposals shall demonstrate the conservation and/or enhancement of the surrounding historic and natural environments.

- 5.3.6 Strategy 5B (Sustainable Transport) explains that development proposals should contribute to the objectives of promoting and securing sustainable modes of travel and transport. The policy continues to explain that *“development will need to be of a form, incorporate proposals for and be at locations where it will encourage and allow for efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport”*
- 5.3.7 Strategy 9 (Major Development at East Devon's West End) states that high quality development with associated infrastructure, built within a high quality landscape setting, will be provided in East Devon's West End. As part of the West End of Devon, Cranbrook is stated as being one of the focal points with new development, with a trajectory set to make Cranbrook a *‘major new East Devon market town’*.
- 5.3.8 Strategy 12 (Development at Cranbrook) aims to ensure development on the site contributes to the wider Cranbrook Plan, providing new homes and commercial spaces integrated with sustainable transport infrastructure and technologies. This policy sets out expectations that the settlement will provide around 6,300 new homes with peak build rates expected to be at 500 per annum.
- 5.3.9 Policy D1 (Design and Local Distinctiveness) promotes the submission of a Design and Access Statement to ensure that proposals have design principles which align with the design guidance found in local planning policy documents.
- 5.3.10 Policy TC2 (Accessibility of New Development) states that proposals which are accessible via sustainable modes of transport and contribute to the minimising of car dependency will be supported.
- 5.3.11 Policy TC9 (Parking Provision in new Development) sets out the parking standards for new developments, and guides that at least one parking space should be provided for one bed properties and two or more bed properties should have two parking spaces, with at least one cycle space provided per home.
- 5.3.12 Policy EN5 (Wildlife and Habitat Features) requires proposals to demonstrate either the mitigation of ecological impacts or the enhancement or creation of habitats to ensure the impact of the development has on the surrounding environment is minimised.

5.4 The Cranbrook Development Plan (DPD)

- 5.4.1 The site would also need to demonstrate alignment with The Cranbrook Development Plan 2013-2031 (DPD).
- 5.4.2 The following policies are considered to be of relevance to the proposal:
- 5.4.3 Policy CB12 (Delivering Zero Carbon) explains how all development will be designed, constructed and person to the higher practicable and viable whole life sustainability standards possible and should; minimised the need to travel, minimise energy demand and carbon emissions, maximise the proportion of energy from renewable or low carbon sources and ensure in-use performance. This policy also contains the requirements for new developments to provide a connection to the District Heating Network.
- 5.4.4 Policy CB16 (Amenity of Future Occupiers) states that the council will support development which aligns with the National Described Space Standards and careful consideration for the residential development of existing and prospective residents.
- 5.4.5 Policy CB19 (Plug-in and Ultra-Low Emission Vehicle Charging) supports proposal which contribute to the expansion and adoption of vehicle charging facilities.
- 5.4.6 Policy CB20 (Parking at Cranbrook) requires proposals to provide 1.7 parking spaces per dwelling to ensure there is sufficient parking throughout Cranbrook.
- 5.4.7 Policy CB23 (London Road Commercial and Retail Proposals) encourages development along London Road to include an active frontage or ensure proposals are capable of ground floor conversion to commercial or retail uses. The policy further states that 'residential uses in these areas will only be permitted where they are designed with an active frontage that directly fronts onto the London Road, and where the ground floor is so designed to ensure that it is fully convertible to facilitate future uses for retail or other footfall dependent commercial uses'.
- 5.4.8 Policy CB24 (London Road Improvements) states that proposals which contribute to the development of London Road, including the improvement of cycle and pedestrian paths will be supported.

- 5.4.9 Policy CB26 (Landscape, Biodiversity and Drainage) states that Development will only be permitted where it is in accordance with an up to date Landscape, Biodiversity and Drainage Strategy (LBDS), and illustrated LBDS Framework plan.

5.5 Five-Year Housing Land Supply

- 5.5.1 East Devon District Council cannot presently demonstrate a five-year housing land supply. Under these circumstances, the NPPF states that the relevant housing policies for determining the application are considered out-of-date. In such cases, the NPPF advises (paragraph 11) that planning permissions should be granted, unless *“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework taken as a whole”*.
- 5.5.2 At present East Devon District can only demonstrate 4.68 years of deliverable housing land as of their latest position statement published in April 2024.

6.0 PLANNING ASSESSMENT

6.1 The Principle of Development

- 6.1.1 The starting point when considering the principle of development is the development plan, and in this case the local development plan consists of the East Devon Local Plan and the Cranbrook Development Plan (DPD). The Cranbrook DPD confirms that the *‘plan will form part of the overall development plan for East Devon and sees to integrate with but expand upon the already adopted East Devon Local Plan’*. Moreover, the DPD confirms that upon adoption the DPD will *‘supersede in its entirety, Strategy 12 (Development at Cranbrook) of the East Devon Local Plan... and makes redundant the ‘Cranbrook Plan Area’*.
- 6.1.2 While it is acknowledged that, in line of the East Devon Local Plan, the site is located within the open countryside Policy 7 seeks to limit residential development, the site it remains closely related to Cranbrook and indeed, is within the area boundary for the new Cranbrook DPD.

- 6.1.3 The Cranbrook DPD sits alongside the East Devon Local Plan and supersedes the policies relating to development in Cranbrook (Strategy 12). Therefore, given the weight to be afforded to the Cranbrook DPD and as a site within the Cranbrook Plan Area, the principle of the development is considered to be supported by the relevant policies of the DPD.
- 6.1.4 In this case, the principle of the development is considered to be established in Policy CB23 of the Cranbrook DPD which states that, while retail and footfall dependent commercial activities will be sought in the first instance, residential uses will be permitted where they are designed with an active frontage onto the London Road and where the ground floor is capable of being converted to accommodate future retail and commercial uses.
- 6.1.5 As discussed during the pre-application enquiry, the site lends itself primarily to residential development. If the Council were to require only commercial development then the site would remain undeveloped. This would be to the detriment of the proposed housing, which is future-proofed with retail compatible designs for the ground floors. The proposed more efficient use of the site would be lost and there would be no enhancement possible to the pedestrian connectivity and wider viability of the high street.
- 6.1.6 In line with Policy CB23, the proposed dwellings have been positioned to have a close physical relationship with the highway. All but one of the units have been positioned to face the highway, with only unit three side on to provide an efficient use of land, to provide a sense of arrival and natural surveillance to the site access. Moreover, due consideration has been afforded to ensuring convertibility of the dwellings' ground floors to accommodate retail and commercial uses where there is sufficient appetite from the landowner.
- 6.1.7 Given the above assessment, the residential development of this site is acceptable in principle under Policy CB23 of the Cranbrook DPD and the provisions of the NPPF.

Written Ministerial Statement

- 6.1.8 The written ministerial statement is a material planning consideration. As such, the weight to be attributed to the delivery of additional housing should not be underestimated.

- 6.1.9 In her Written Ministerial Statement dated 30th July 2024, the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government stated that *“We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home.”* The Ministerial Statement concluded in saying that *“There is no time to waste. It is time to get on with building 1.5 million homes.”* Written Ministerial Statements are considered material considerations, and should be afforded due weight in decision making.

Five-Year Housing Land Supply

- 6.1.10 East Devon District Council currently cannot demonstrate a Five-Year Housing Land Supply with a demonstrably supply of only 4.68 years. The Emerging East Devon Local Plan is currently at Regulation 19 stage, and as such is, under the current NPPF, only required to demonstrate a four-year supply of deliverable housing land.
- 6.1.11 Under the new NPPF all LPAs will be required to demonstrate a Five-Year Housing Land Supply irrespective of the stage of their emerging local plan. Therefore, should the proposed changes the NPPF be carried forward, the Council would no longer be able to demonstrate a sufficient supply of housing land, thus triggering the presumption in favour of sustainable development. Under the proposed standard method East Devon District Council will be required to find an additional 25-50% on top of their existing housing stock.
- 6.1.12 Whilst the draft NPPF will not be a key consideration for plan-making now, the LPA may wish to bear in mind the high likelihood that at the end of this year they will need to deliver significantly more housing stock.

6.2 Layout and Density

- 6.2.1 The layout of the site complies with policy CB23 which supports the placement of development along London which is capable of conversion into commercial units at a later date. The layout and density is consistent with the character of the area
- 6.2.2 The proposed dwellings are situated to ensure there is no harm to the residential amenity of neighbouring properties. There will be no undue overlooking, loss of privacy or natural light. The proposed dwellings will not result in an overbearing relationship with other dwellings.

- 6.2.3 The proposed dwellings will each benefit from high levels of amenity, with good sized rooms, natural light, allocated parking and private amenity space.

6.3 Landscape and Visual Impact

- 6.3.1 The proposal integrates hedgerows along the boundaries of the domestic curtilages and intermittent tree planting. The architectural style aligns with that of the surrounding dwellings, minimising the visual impact the development will have on the surrounding area.
- 6.3.2 The parking provision has been positioned to the north of the site away from the active frontage of the proposal, thus helping ensure the public realm is pedestrian focused and suitable for a future high street setting.
- 6.3.3 The site is considered to provide betterment through the development of modern dwellings which are designed to align with the surrounding properties, meeting the criteria of Policy D1.

6.4 Highways and Transport

- 6.4.1 The development includes highway improvements through a consolidated access and delivery of a new and enhanced pedestrian links. The two metre wide footway and safe pedestrian crossing points with dropped kerbs and tactile paving will significantly improve travel by foot, cycle and wheel. These proposed footway and access arrangement will contribute positively to the development of the allocated London Road commercial and retail policy which aims to create a high street along this stretch of road through the development of the adjoining properties. Without this proposed development, the viability of this future high street use would be significantly diminished.
- 6.4.2 On-site parking provisions will be provided and will include both cycle and EV charging points. The proposed development will provide a total of 10 car parking spaces, 14 cycle spaces and a total of five EV charging points. This parking arrangements meet the standards set out in Policy CB19 and CB20, providing the adequate vehicle charging facilities for electric and low-emission personal vehicles.
- 6.4.3 The proposed dwellings would be is accessible via sustainable modes with existing public transport links being in close proximity to the site including bus links to Exeter and Honiton along London Road as well as Cranbrook train station which provides national connections.

6.4.4 A Highways Technical Note has been prepared by Advance Consulting Engineers Ltd which accompanies this application and demonstrates that the proposed priority T-junction and associated footway works will provide visibility splays of 2.4m x 82m in both directions and will be suitable to serve the proposed development. Moreover, the Swept Path Analysis demonstrates that large refuse vehicles and emergency vehicles such as fire engines will be able to enter the site, navigate the proposed turning head and egress the site safely.

6.4.5 Overall the proposals are considered to accord with Policy TC2 of the local plan and the NPPF.

6.5 Heritage

6.5.1 By virtue of the site's proximity to the putative route of the former Roman road which runs from Exeter to Honiton, a Project Design for an Archaeological Trench Evaluation has been included as part of the submission.

6.5.2 The document sets out proposals for undertaking an archaeological trench evaluation at the site. It represents the Written Scheme of Investigation anticipated to be required by East Devon District Council as a condition of planning for a forthcoming planning application for a residential development, following consultation with the Devon County Council Historic Environment Team.

6.5.3 As the heritage sensitivities in relation to this site are below ground and there is a strategy in place to ensure the archaeological potential is adequately addressed, it is not considered that heritage stands in the way of permission being conditionally granted for the proposed development.

6.6 Ecology and Biodiversity

6.6.1 The accompanying Ecological Assessment prepared by Redstone Ecology concluded that due to the size of the site and by virtue of the fact that it comprises existing domestic curtilage, it was of low habitat value. A Preliminary Roost Assessment of the building was undertaken with three additional dusk emergence surveys along with bird and reptile surveys. The findings of these survey are surmised below along with details on the appropriate mitigation and compensation measures.

- 6.6.2 The Assessment found bird nesting was likely. Moreover, the two dwellings offered suitable access for bat usage with roost potential found within loft space. Given the roost potential found within the dwelling three emergence surveys were carried out and covered all access points. A single common Pipistrelle was recorded during the second survey, with no other emergencies or species were recorded and it was concluded that the structure contains a single common pipistrelle day roost used by a small number of bats. The hedgerows and trees in the wider area were also considered to provide optimal commuting and foraging habitat.
- 6.6.3 A small population of slow worms were recorded, and while no other reptiles or amphibians were observed their presence could not be discounted.

Mitigation Measures

- 6.6.4 In response to the findings, the Ecological Assessment has set out a number of mitigation measures which will be included within the design and secured by the Council as necessary.
- 6.6.5 It is proposed to install three timber bat boxes on the mature oak tree prior to works starting, and the installation of five crevice roost features on the proposed dwellings to ensure bat species are not displaced as a result of the works. To mitigate any disruption to bird species, three wooden nest boxes and one house sparrow terrace per unit will be provided and measures will be taken to ensure works take place outside of nesting season. Where works take place within nesting season a pre-work check will be carried out by an ecologist. Should a nest be found all work will cease until all chicks have fledged. Reptile translocation will take place prior to works commencing to ensure no reptiles or amphibians are harmed. Further details on this process are contained within the Ecological Assessment.
- 6.6.6 Further mitigation measures are to include ensuring that any deep pits are covered overnight, or a suitable means of escape such as a wooden plank are provided to provide a safe exit route for any mammals that should enter the pit. All pits are to be inspected each morning and any trapped mammals will be moved to a suitable off-site habitat.

Biodiversity Net Gain

6.6.7 This application is also accompanied by a Biodiversity Net Gain Report prepared by Redstone Ecology. The BNG report confirms that, with the on-site habitat creation and off-site habitat enhancement outlined in the BNG report, the proposed development will result in a total net biodiversity change of +0.52 habitats units equating to +93.94%, and +0.02 hedgerow units (16.23%). The proposed development will therefore deliver overall gains in biodiversity and will accord with the relevant planning policy and legislation.

6.6.8 In line with the above and as evidenced in the accompanying reports the proposals will accord with Policy EN5 and Strategy 5 of the Local Plan, as well as Chapter 15 of the NPPF.

6.7 Arboricultural

6.7.1 In response to the presence of vegetation and tree growth throughout the site, an Arboricultural Impact Assessment (AIA) has been carried out by Clark Landscape Design. The AIA concluded that none of the trees within the site are protected by TPO nor are they within a conservation area. Overall the site was deemed to house limited tree coverage with all trees, save for garden shrubs, of limited value growing around the perimeter of the site. The Oak tree, referred to as T1 in the AIA has reasonable form and is considered to provide longer term amenity and wildlife interest.

6.7.2 To ensure no trees to be retained are harmed during the construction phase, tree barriers are to be erected and no works will take place within these exclusion zones, and no vehicles will be allowed to enter nor material be stored in these areas. The specification and siting of the protective fencing is shown in Appendix 1 and 2 of the AIA.

6.7.3 As a result of the findings of the AIA and the protective measures outlined, as well as the proposed additional planting within the site, the impacts on arboriculture are acceptable.

6.8 Flood Risk and Drainage

6.8.1 The site is located wholly within Flood Zone 1 with regard to coastal and fluvial related flooding, and while there is some minor surface water along the frontage of the site this is limited only to a low (1 in 1,000yr) probability.

- 6.8.2 Accompanying this report is a Drainage Strategy and Water Quality Assessment (DSWQA) prepared by Enviren. It explains infiltration is not a viable method of discharge. As such, a conveyance form of surface water disposal to the combined sewer will need to be provided. The DSWQA confirms that surface and foul water from the existing cottages enters the combined sewer which runs through Rockbeare. Hydraulic calculations for the proposed on-site network are presented in the DSWQA and in summary demonstrate that discharge rates shall be constrained to 2.0l/s through a Hydro International Hydrobrake flow control device. The proposals therefore provide an opportunity to significantly reduce the discharge rates going into the combined network.
- 6.8.3 The Wider Water Quality Assessment has been prepared to demonstrate that the proposed permeable paving will provide suitable cleansing. The DSWQA details how the paving will comprise upstream silt traps on all inlets to mitigate sediment build along with a geotextile membrane to ensure soil does not enter the system. Overall, the proposed development was considered to afford a betterment over the existing discharge rates and will reduce the risk of flooding through preventing blockages, thus reducing likely impacts on downstream receptors.
- 6.8.4 Overall, with the implementation of the surface water control strategies outlined in the DSWQA, the proposed development will neither be at significant risk of flooding for the entirety of its design life nor will it result in an increased likelihood of flood risk elsewhere. The proposal is therefore acceptable in flood risk and drainage terms.

6.9 Connection to the District Heat Network

- 6.9.1 In line with Strategies 12 and 40 of the East Devon Local Plan and Policy CB12 of the Cranbrook DPD, we note that new developments are required to provide a connection to the District Heating Network (DH). Discussions with E.ON have taken place throughout the preparation of the application to seek an opinion on the feasibility of connecting to the network. They have advised that a connection to the DH would be feasible via the London Road at a cost of approximately £8,000 per dwelling. Given the costs associated with connecting to the DH, the potential delays to occupations whilst awaiting connection, and the potential to achieve carbon efficient homes through on-site integration of microgeneration, we would suggest leaving such matters to a condition. The condition would allow either a connection to the DH or a plan showing the use of microgeneration. This could be agreed prior to occupation and ensure that the Council are meeting their climate targets.

7.0 CONCLUSION

7.1 Summary

- 7.1.1 The proposal is for in-fill development within a sustainable location adjoining the settlement of Cranbrook. The development will deliver clear economic, social and environmental benefits. In particular the development will provide three additional dwellings in an area where there is a need for further housing growth. Additionally, it furthers the potential of the Cranbrook Local Plan's ambition to see a new high street for the town through design and pedestrian connectivity enhancements
- 7.1.2 This statement and the supporting specialist reports confirm that the development can be delivered without significant adverse impact upon the environment or ecological interests, drainage and flood risk, highway safety, residential amenity, heritage assets, visual or landscape character, or other interests of acknowledged importance to planning.
- 7.1.3 The proposal is considered to satisfy the relevant planning policy considerations at local and national levels and therefore benefits from the policy presumptions in favour of sustainable development, such that planning permission should be granted without delay.
- 7.1.4 Under the presumption in favour of sustainable development set out within the Local Plan and the NPPF, we respectfully request that planning permission be granted.

