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Please reply to: Darryl White Service: Strategy & Commissioning Direct Dial: (01803) 861247

E-mail address: Darryl.White@swdevon.gov.uk

Date:

**Dear Councillor** 

## **SOUTH HAMS COUNCIL - THURSDAY, 17TH MAY, 2018**

I refer to the agenda for the above meeting and attach papers in connection with the following item(s).

## Agenda No Item

18. <u>Joint Local Plan Main Modifications Consultation</u> (Pages 1 - 78)

Yours sincerely

Darryl White Senior Specialist – Democratic Services

**Encs** 



## PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN – PROVISIONAL SCHEDULE OF ADDITIONAL (MINOR) MODIFICATIONS (13 April 2018)

| Ref | Past ref /<br>document | Part of JLP<br>(Submission<br>version)<br>affected   | Additional modification  | Reason why the modification is considered to be minor   |
|-----|------------------------|--|--|---|
| AM1 | HM21<br>(EXD5v)        | Introduction   | New para after 1.18. In addition to the JLP the LPAs will prepare supplementary planning documents (SPDs) for both the Plymouth Policy Area and the Thriving Towns and Villages Policy Area. These SPDs will build upon and provide more detailed advice or guidance on the policies in the JLP where appropriate. | It merely includes in introduction a commitment to prepare these SPDs that exists in several other places in the plan. The wording proposed reflects the guidance set out in NPPG para Paragraph: 028 Reference ID: 12-028-20140306 |
| AM2 | M1<br>(EXC10A)         | Vision –<br>'Strategic<br>Objectives of<br>Plan' box | 9. Maintaining the viability of the many sustainable villages in the rural area: To enable the development of new homes, jobs and community infrastructure sufficient to meet the local needs of the sustainable villages identified in the area and the village networks they serve.                              | The modification merely clarifies what is self-evident in the way the spatial strategy is designed to work, acknowledging that village support one another through village networks (e.g. see paras 3.10 and 5.153)                 |
| AM3 | M2<br>(EXC10A)         | Vision –<br>'Strategic<br>Objectives of<br>Plan' box | 10. Maintaining a naturally beautiful and thriving countryside: To protect, conserve preserve and enhance the natural beauty of South West Devon's countryside, and to avoid the creation of new homes development in unsustainable or inappropriate locations.  | The modification is considered to be helpful and consistent with the spatial strategy and development policies of the plan. – in particular SO1, TTV31 and DEV24-27.  |
| AM4 | M3<br>(EXC10A)         | Vision –<br>'Strategic<br>Objectives of              | 11. Delivering high quality development: To deliver development which is sustainable and of the right type for its location and of good quality.   | Although not strictly necessary, the modification is considered to provide helpful clarification.   |

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|     |                         | Plan' box  |  |   |
| AM5 | M4<br>(EXC10A)          | Spatial<br>Strategy – para<br>3.4                  | These spatial levels represent an appropriate structure for organising the plan, acknowledging the inter-relationships between Plymouth, its urban fringe and South West Devon, and the inter-relationships between the main towns, villages and rural areas of South West Devon. These spatial levels | Although not strictly necessary, the modification is considered to provide helpful clarification.   |
| AM6 | HM1<br>(EXD5i)          | Spatial<br>Strategy –<br>Policy SPT1               | 1iii Strategically important local economic assets are protected for the purpose of economic activity.   | Although we don't consider that any change is necessary for soundness, we can agree with a modification of wording which was suggested during the hearing sessions. It is consistent with the relationship of this provision to the LEP's Strategic Economic Plan and related provisions elsewhere in the plan (especially para 6.51, but also PLY3, SO3, DEV14). |
| AM7 | HM2<br>(EXD5i &<br>5ii) | Spatial<br>Strategy –<br>Policy SPT1               | 3i The effective Efficient use of land is made for development through optimising reuse of previously developed sites, therefore reducing the need for greenfield development, protecting natural assets and creating opportunities for viable low carbon energy schemes.                              | Although we don't consider that any change is necessary for soundness, the modification responds more directly with the positive wording of Framework para 17, bullet point 8; and para 111.  |
| AM8 | HM3<br>(EXD5i)          | Spatial<br>Strategy –<br>Policy SPT1               | 3ii Overall gains in biodiversity are achieved by protecting and enhancing species, habitats and geological sites where possible.  | Although we don't consider that any change is necessary for soundness, this change which was suggested during the hearing sessions can be justified. This is on the basis of Framework para 7 (3 <sup>rd</sup> bullet) which includes an objective of protecting and <i>enhancing</i> the natural environment and helping to                                      |

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|      |                        |  |   | improve biodiversity, and para 9 (2 <sup>nd</sup> bullet) which speaks of moving from a net loss of biodiversity to achieving net gains. These are the sections of the Framework which establish the overarching principles of sustainable development which the rest of the Framework then amplifies. SPT1 is designed to play a similar role for the JLP, as identified in our Matter 2 Statement. Policy DEV28.2 sets out more detail on the implementation of this high level principle. |
| AM9  | M5<br>(EXC10A)         | Spatial<br>Strategy –<br>Policy SPT2               | 2. Provide for higher density living appropriate to the local area in the areas that are best connected to sustainable transport, services and amenities, as well as appropriate opportunities for home working, reducing the need to travel.   | Although not strictly necessary, the modification is considered to provide helpful clarification.  |
| AM10 | HM5<br>(EXD5i)         | Spatial<br>Strategy – para<br>3.17                 | Figure 3.2 below sets out a series of measures that the LPAs will use in implementing Policy SPT2 and the other policies of the plan. The measures are aspirational, in the sense that they represent sustainability outcomes that are aspired to for an area. However, they also represent standards that individual development proposals will be considered against, as part of the overall planning judgment. The measures are not intended to be applied through an inflexible 'tick box' exercise to determine the acceptability or otherwise of development, given that such an approach could restrict development that is fundamentally sustainable and makes a significant positive | Although we don't consider that any change is necessary for soundness, the modification responds to a discussion at the hearings and sets out more specifically how figure 3.2 will be used in a decision making context as a clarification to the plan.   |

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|      |                        |  | contribution to delivering the vision and strategy of the plan. However, the measures do contribute to the overall planning judgement, including the need for appropriate mitigation. Some of these figures will be updated during the life of the plan. The most up to date standards will always be available in the evidence base documents informing the plan and the accompanying Supplementary Planning Documents.   |   |
| AM11 | HM6<br>(EXD5i)         | Spatial<br>Strategy – new<br>para to follow<br>para 3.17 | It should be noted that the measures in Fig 3.2 do not relate to the sustainable villages of the TTV Policy Area. This recognises the more remote rural context of such settlements, which are characterised by limited provision of physical services and amenities, and may depend on a wider networks of villages to the meet their wider service requirements. Local communities are able to produce evidence and develop local policies as part of their neighbourhood planning processes to support the delivery of sustainable development in these villages. | Although we don't consider that any change is necessary for soundness, the modification responds to a discussion at the hearings. It explains that neighbourhood plans can play a role in defining sustainability measures for those parts of the TTV settlement hierarchy that fall outside of the provisions of figure 3.2. |
| AM12 | M321<br>(EXC10Ai)      | Spatial<br>Strategy – fig<br>3.2                         | Change TTV Accessible Natural Space standard to: 1.91 per 1000   | This is a correction of the application of the evidence base to fig 3.6   |
| AM13 | M322<br>(EXC10Ai)      | Spatial<br>Strategy – fig<br>3.2                         | Change TTV Playing Pitch standard to: 1.27 per 1000  | This is a correction of the application of the evidence base to fig 3.6   |
| AM14 | HM9                    | Spatial  | Economic forecasts which have been prepared  | Although we don't consider that any change is   |

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|      | (EXD5ii)               | Strategy –para<br>3.34 (SPT4)                      | alongside the review of the OAN for housing and the preparation of the SHMNA suggest that around 13,200 additional jobs will be generated in B-use class industries in the period up to 2034. It should also be noted that significant numbers of jobs will also be created by businesses and organisations that are not classified as traditional industrial 'B use' classes. For example, retail and service businesses, the health sector and residential institutions will all come forward during the plan period and create jobs which will be available to people living in the area. Policy SPT4 does not make provision for these developments, but the jobs created, currently estimated at about 7,200 jobs, will clearly contribute to the growth and creation of sustainable communities across the Plan Area. In total, therefore, the plan supports the creation of an additional 20,400 jobs. | necessary for soundness, the modification responds to a discussion at the hearings. The additional job information helps to clarify the total level of job growth anticipated in the plan period.                       |
| AM15 | M6<br>(EXC10A)         | Spatial<br>Strategy –<br>Policy SPT7               | 4. Cooperate with Dartmoor National Park to ensure delivery of the needs of the HMA whilst protecting the special landscapes qualities of the National Park.  | Although not strictly necessary, the modification is considered to provide helpful clarification.   |
| AM16 | M7<br>(EXC10A)         | Spatial<br>Strategy –<br>Policy SPT7               | NEW POINT Cooperate with the Tamar Valley and South Devon AONB Partnerships in the implementation of the plan's policies for conserving the landscape and scenic beauty of the AONBs.   | Although this is an additional point to the policy, it merely states an intent which the LPAs are already committed to. It could equally be referenced in the narrative that follows the policy, or even taken as read. |
| AM17 | M8                     | Spatial  | Additionally, given its roles and responsibilities for  | The additional narrative has been requested by DCC  |

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|      | (EXC10A)               | Strategy – new<br>para after para<br>3.57          | planning and infrastructure in the Plan Area - especially for the TTV Policy Area and the Plymouth urban fringe within South Hams - Devon County Council has played a key role in the preparation of the plan and will continue to do so in relation to its implementation.                               | and is a statement of fact.   |
| AM18 | M9<br>(EXC10A)         | Spatial<br>Strategy –<br>Policy SPT8               | 3iv. Supporting improvements to local rail connectivity and links between Tavistock and Plymouth and Okehampton and Exeter.   | This minor text change clarifies the context for this part of the policy.                         |
| AM19 | M10<br>(EXC10A)        | Spatial<br>Strategy – para<br>3.66                 | Rail travel in the South West has seen passenger growth of over 128% 133 per cent over the last 21 years (The Office of Rail and Road footfall data), twice the national average and consistently outstripping rail industry forecasts. meaning that future planning for capacity is inaccurate. Combined | This minor text change is an update.  |
| AM20 | M11<br>(EXC10A)        | Spatial<br>Strategy – para<br>3.67                 | The opportunity exists to make better use of the rail networks in the sub region, through the realisation of the Plymouth Metro, with the city at its hub, within a wider Devon Metro strategy and including taking advantage of plans to re-open the local rail link to Tavistock as an initial step to  | Although not strictly necessary, the modification is considered to provide helpful clarification. |
| AM21 | HM7<br>(EXD5i)         | Spatial<br>Strategy –<br>Policy SPT9               | The LPAs and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver an integrated approach to transport and planning, delivering a strategic approach to transport based upon the following key principles  | Removal of unnecessary words to help clarify the policy.  |

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| AM22 | HM8<br>(EXD5i)         | Spatial<br>Strategy –<br>Policy SPT9               | 1. Sustainable growth as a key driver behind the transport strategy within Plymouth, whilst making sure that transport is delivered in the most health promoting and environmentally responsible manner.   | Although we don't consider that any change is necessary for soundness, the modification responds to a discussion at the hearings. Devon County Council have confirmed they are happy with the modification proposed.     |
| AM23 | HM10<br>(EXD5ii)       | Spatial<br>Strategy –para<br>3.74 (SPT9)           | The policy recognises that local communities are well placed to identify transport issues and solutions for their area. One way this can be done is through neighbourhood plans. The framework established by the policy seeks to guide local communities in identification and promotion of appropriate sustainable transport options for their communities. It also seeks to ensure that development takes place in the most sustainable and efficient locations in relation to supporting sustainable transport choices, and delivers balanced growth that minimises the need to travel by providing easy access to community amenities, leisure opportunities and our high quality natural environment by sustainable transport. | The additional text is not necessary for soundness reasons but responds to a discussion at the hearing about the possible role of neighbourhood plans in supporting Policy SPT9, consistent with point 10 of the policy. |
| AM24 | M23<br>(EXC10A)        | Spatial<br>Strategy – para<br>3.83                 | A healthy natural environment is also an important part of enhancing the health and wellbeing of communities, and plays an important role in protecting water quality and managing flood risk.   | Although not strictly necessary, the modification is considered to provide helpful clarification.  |
| AM25 | M24<br>(EXC10A)        | Spatial<br>Strategy – para<br>3.90                 | These designations and policy protections include the Tamar Valley and South Devon Areas of Outstanding Natural Beauty (AONBs) and   | Although not strictly necessary, the modification is considered to provide helpful clarification.  |

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|      |                        |  | Dartmoor National Park as protected landscape areas which receive the highest degree of protection The Cornwall and West Devon Mining Landscape World Heritage Site (WHS) is designated by UNESCO for it international landscape significance. In respect of the National Park, although the park lies entirely outside of the boundary of the Plan Area, it is important that decisions taken within the Plan Area take account of its special status. |   |
| AM26 | M334<br>(EXC10Ai)      | Spatial<br>Strategy –<br>Policy SPT12              | The LPAs will work in partnership with key funding partners and investors in order to ensure that the infrastructure needed to deliver the spatial strategy is prioritised delivered.   | Minor modification agreed as part of Statement of Common Ground negotiations. The modification does not change the context of the policy. |
| AM27 | M25<br>(EXC10A)        | Spatial<br>Strategy –<br>Policy SPT12              | 5. Strategic green infrastructure sites and a functional network of greenspaces which meet the needs of local communities and help to manage avoid recreational impacts on European Sites and enhance the natural environment.  | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Natural England.     |
| AM28 | M26<br>(EXC10A)        | Spatial<br>Strategy – para<br>3.96                 | The successful delivery of the spatial and growth strategy set out in the plan will to a large extent be dependent on significant improvements to and investments in infrastructure, some of which will be required in any case to meet statutory obligations (for example, in relation to helping avoid recreational impacts to European Sites). The measures and projects set out in the JLP have been identified in tandem with the preparation of   | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Natural England.     |

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|      |                        |  | the plan.   |   |
| AM29 | M27<br>(EXC10A)        | Spatial Strategy – box after para. 3.105 (and consequential change in Annex 2) | E. The area's stunning setting, maritime heritage, quality environment and natural assets continue to be protected and harnessed enhanced.  | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Natural England. |
| AM30 | M335<br>(EXC10Ai)      | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY4                       | Where Ministry of Defence land is surplus to the strategic defence requirement, priority will be sought for uses which help to deliver the plan's economic growth objectives and                      | The modification does not change the context of the policy.   |
| AM31 | M28<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY5<br>(title)            | Safeguarding Sustainable use of Plymouth's mineral resources  | The modification is considered to provide helpful clarification, consistent with the overall intent of the policy.                    |
| AM32 | M29<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY5                       | 1. As far as practicable, prioritising the use of recycled and secondary aggregates, including those derived from construction and demolition waste, over before the quarrying of primary aggregates. | Although not strictly necessary, the modification is considered to provide helpful clarification.                                     |
| AM33 | M30<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY5                       | 3. Safeguarding key minerals related infrastructure and facilities needed to support the handling, processing and distribution of mineral resources.  | Although not strictly necessary, the modification is considered to provide helpful clarification.                                     |
| AM34 | M31<br>(EXC10A)        | Strategy for<br>Plymouth   | 4. The use of planning conditions and legal obligations to ensure the timely high quality   | The modification is considered to provide helpful clarifications, consistent with the Policy DEV28.                                   |

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|      |                        | Policy Area –<br>Policy PLY5                             | restoration and aftercare of mineral sites once they have been worked out. The restoration will be required to take account of make a positive contribution to geodiversity geo- and biodiversity, native woodland, the historic environment and recreation, and where possible recreate and/or restore wildlife habitats.   |   |
| AM35 | M336<br>(EXC10Ai)      | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY5 | -7. Seeking appropriate planning conditions and agreements in relation to minerals extraction outside of the city boundary which impacts on the city's environment and local communities. This should include the development of a comprehensive access strategy which takes construction and other heavy goods traffic more directly to the A38, avoiding Plympton's urban road network.  | The modification does not change the context of the policy, and the provisions are still included in the plan (see AM38). |
| AM36 | M33<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>para 4.19   | The policy provides a strategic framework for the use and extraction of minerals resources within the city boundary. Outside of the city boundary, the Minerals Planning Authority is Devon County Council, and the Devon Minerals Plan 2011-2031 was adopted in February 2017. In this respect, Policy PLY5 will help to shape representations the councils make in relation to minerals developments within the Devon Minerals Plan area. (given that minerals policies for the areas outside of the city boundary are covered by the Devon Minerals Plan). The starting principle for | The modification is considered to provide helpful clarifications, and does not change the context of the policy.          |

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|      |                        |  | the policy is to prioritise the reuse and use of recycling recycled and of secondary aggregates as far as practicable. However, Plymouth's growth will increase demand for primary aggregates to supply construction projects.  |  |
| AM37 | M34<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>para 4.20 | 4.20 The EU has defined tungsten as a critical raw material, and the British Geological Survey have placed tungsten joint close to the top of its global risk list due to its scarcity  | This minor modification is proposed by the LPAs as an update.  |
| AM38 | M337<br>(EXC10Ai)      | Plymouth<br>Policy Area –<br>para 4.20                 | Decisions made within Plymouth therefore need to have regard to these wider interests, whilst also recognising the complementary role of Devon Minerals Plan in safeguarding the city, its residents and its overall landscape setting from damaging environmental, amenity and transport impacts of these open cast operations. In this respect, the Plymouth minerals planning authority would seek appropriate planning conditions and agreements in relation to minerals extraction outside of the city boundary which impacts on the city's environment and local communities. This should include where appropriate the development of a comprehensive access strategy which takes construction and other heavy goods traffic more directly to the A38, avoiding Plympton's urban road network. | The modification does not change the context of the policy/ See AM35.                                    |
| AM39 | M35<br>(EXC10A)        | Strategy for Plymouth                                  | In addition to providing for and safeguarding minerals extraction, the policy also protects key   | The modification is considered to provide helpful clarification, adding some flesh to the provisions set |

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|      |                        | Policy Area –<br>new para after<br>para 4.26  | infrastructure relating to the handling, processing and distribution of minerals. This includes key marine infrastructure in the Cattedown Harbour area, with Cattedown Wharf, Pomphlett Wharf, Corporation Wharf and Victoria Wharf all providing important facilities.  | out in Policy PLY5 regarding safeguarding of minerals infrastructure.   |
| AM40 | M36<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY6 | 2. Respects and celebrates the centre's mid-<br>twentieth century built heritage, including<br>preserving and enhancing the Beaux Arts grid of<br>the 1943 Abercrombie Plan and the highest and<br>good quality non-designated assets identified in<br>the City Centre Masterplan.  | Although not strictly necessary, the modification is considered to provide helpful clarification.   |
| AM41 | M37<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY6  | NEW POINT . Recognises the importance of reinforcing the primacy of Armada Way as the principal thoroughfare from the station to the Hoe. This will be achieved by focusing larger development - building heights of six to eight storeys - on the Armada Way frontage to provide enclosure to the space and to maintain a degree of consistency to these increased building heights to respect the Abercrombie Plan's form and historic context. | This provision is internally consistent with PLY6.6ii and already exists in site specific policies in the City Centre (PLY9-13); it is a helpful clarification to incorporate it into the strategic policy for the city centre and provide some amplification of the purpose behind the building heights provision. |
| AM42 | M38<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY6  | 9. Facilitates easier movement in and around the City Centre for all modes of transport, including reconnecting the City Centre with its neighbouring areas - which include Millbay, Sutton Harbour and the Hoe – by high quality   | Amplifies the existing point but in a way that is already provided for elsewhere in the plan (Policy PLY20.2v)  |

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|      |                        |  | walking and cycling links.  |  |
| AM43 | M39<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY6 | 10. Supports the delivery of a coordinated programme of investment in the public realm and delivers structured environmental improvements, creating a safe accessible and attractive environment for the community and visitors alike, and exploring opportunities for weather protected spaces.  | Amplifies one dimension of public realm improvements and is entirely consistent with the policy intent.                                |
| AM44 | M40<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY6 | 11. Delivers proposals that are resilient and respond to the challenges of climate change and protect the Plymouth Sound and Estuaries European Marine Site from pollution, providing where appropriate improvements to flood management infrastructure, surface water drainage systems, and future connection to critical drainage infrastructure and district heat networks relevant to the site. | Helpful clarification which is supported and consistent with other parts of the plan, especially PLY37.7 & 9; SPT12 and DEV37.         |
| AM45 | M41<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY7 | 6. The retention and refurbishment of the Art Deco Colin Campbell House, where it is practicable and viable to do so. Demolition will only be considered should there be no reasonable alternative.   | Although not strictly necessary, the modification is considered to provide helpful clarification.                                      |
| AM46 | M42<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY8 | 7. Conserving and enhancing the significance and settings of designated and non-designated heritage assets along Royal Parade.  | The significance of these assets would have in any case been conserved and enhanced in accordance with Policy PLY8.1, DEV21 and DEV22. |
| AM47 | M43<br>(EXC10A)        | Strategy for Plymouth                                    | 2. Buildings of between 5-6 storeys in height, with 6-8 storeys along Armada Way frontage), to  | The modification is considered to provide helpful clarification and provide some amplification of the                                  |

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|      |                        | Policy Area –<br>Policy PLY10                             | reinforce the primacy of this principal thoroughfare from Plymouth Railway Station to the Hoe.   | purpose behind the building heights provision.   |
| AM48 | M44<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY10 | 1. Recognition of the high heritage and architectural value of the buildings and the protection and enhancement of these in any partial demolitions and external alterations.  | Although not strictly necessary, the modification is considered to provide helpful clarification.                      |
| AM49 | M45<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY13 | 1. Recognition of the high heritage and architectural value of the buildings and the protection and enhancement of these in any minor partial demolitions and external alterations.  | Although not strictly necessary, the modification is considered to provide helpful clarification.                      |
| AM50 | HM11<br>(EXD5ii)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY14 | Land at The Crescent, Derry's Cross is allocated for mixed use development which could support a range of uses including small scale retail, leisure, a quality hotel, offices and a range of substantial quantity of high quality housing. Provision is made for in the order of 120 homes. | This is the correction of an error that occurred at drafting stage; the text to be deleted is unrelated to the policy. |
| AM51 | M46<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY14 | 1. High quality layout and building design that appropriately responds to the local context, including the significance and setting of the listed Crescent.  | Although not strictly necessary, the modification is considered to provide helpful clarification.                      |
| AM52 | M48<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY18 | Land at North Hill and Tavistock Place is allocated for a History Centre, together with a higher education and/or business-led mixed use development on Tavistock Place / Chapel Street with enabling student housing development in cluster flat format                                     | The modification adds some flexibility around delivery without impacting on its core purpose.                          |
| AM53 | M49                    | Strategy for  | 8. Ensuring that development is resilient, responds  | The modification is considered to provide helpful  |

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|      | (EXC10A)               | Plymouth<br>Policy Area –<br>Policy PLY20                 | to the challenges of climate change and protects the Plymouth Sound and Estuaries European Marine Site from pollution. This will be achieved through providing where appropriate to the site, improvements to surface water drainage systems, future connection to critical drainage infrastructure and district heat networks relevant to the site, delivering flood protection measures, and/or contributing proportionately to strategic flood risk management measures in line with local strategies where they exist.                            | clarification, and would be required in any case through the implementation of Policy DEV37.                    |
| AM54 | M50<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>para. 4.93   | The Environment Agency's 'hold-the-line' policy for Plymouth's developed waterfront provides the basis for continued maintenance and improvement of coastal defences against erosion and flooding, and thus the protection of existing infrastructure and the development of coastal sites. The Councils will continue to work with the Environment Agency and other stakeholders to development suitable strategies for the management of coastal flood risk. Developments will be expected to contribute to the costs of new and improved defences. | This modification simply provides a statement of intent on behalf of the Councils with no impact on the policy. |
| AM55 | M51<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY23 | Protects the opportunity for a high quality tall building on the axis of Barbican Approach and Lockyer's Quay, relating to a major new waterfront public square and acting as a positive, memorable and widely visible landmark for the Sutton  | This modification addresses an error in the original drafting.  |

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|      |                        |   | Harbour East area, Coxside.  |  |
| AM56 | M52<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY23 | NEW POINT Flood resistant and resilient design<br>and contributions towards the upgrade and<br>improvement of existing flood defences, as set out<br>in line with Environment Agency advice. | These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm this to be that case.                              |
| AM57 | M53<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY24 | NEW POINT Flood resistant and resilient design<br>and contributions towards the upgrade and<br>improvement of existing flood defences, as set out<br>in line with Environment Agency advice. | These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm this to be that case.                              |
| AM58 | M54<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY25 | NEW POINT Flood resistant and resilient design<br>and contributions towards the upgrade and<br>improvement of existing flood defences, as set out<br>in line with Environment Agency advice. | These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm this to be that case.                              |
| AM59 | M55<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY26 | NEW POINT Flood resistant and resilient design<br>and contributions towards the upgrade and<br>improvement of existing flood defences, as set out<br>in line with Environment Agency advice. | These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm this to be that case.                              |
| AM60 | M58<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY29 | NEW POINT Measures to ensure resistance and resilience to coastal flooding and improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.         | These requirements would have come from the implementation of Policy DEV37, but we are happy to amplify the site specific policy to confirm this to be that case.  |
| AM61 | M60<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY30 | NEW POINT East / West public linkages through the site to provide better connections through the area.   | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Historic England. The aspiration is consistent with the policies DEV20.2 and DEV31.5. |
| AM62 | M61<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –                 | NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk  | These requirements would have come from the implementation of Policy DEV37, but we are happy to amplify the site specific policy to confirm this to be   |

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|      |                        | Policy PLY30  | Management Strategy.  | that case.   |
| AM63 | M63<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY31 | NEW POINT East / West public linkages through the site to provide better connections through the area.  | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Historic England. The aspiration is consistent with the policies DEV20.2 and DEV31.5. |
| AM64 | M64<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY31 | NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.  | These requirements would have come from the implementation of Policy DEV37, but we are happy to amplify the site specific policy to confirm this to be that case.  |
| AM65 | M65<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | Land at Stonehouse Barracks is allocated for a mixed use development, the final nature, form and scale of which is determined following the completion of a detailed assessment of the site's heritage assets and the preparation of a masterplan. Subject to confirmation through this process, provision is made for 400 new homes. Other uses to be provided as part of the mix include appropriate local facilities to support the new and existing residents and to enhance the sustainability of the existing area, cultural, community and sports / recreation uses, with opportunity also to provide a high quality hotel with facilities to support local businesses and events, and small scale retail and office uses. | The new wording moves wording that was previously in point 11 of the policy, enabling consequential deletions in the front end of the policy. There is no new content.                                     |
| AM66 | M66<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | 2. High quality sensitive restoration and reuse of the site's historic buildings, including retention and restoration of the Globe Theatre as a community facility.   | Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.  |

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| AM67 | M67<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | 5. Retention of key infrastructure on the site relating to the management of Plymouth's waters. 6. , and the safeguarding of the waterfront from coastal flooding. Measures to ensure the improvement of surface water management to protect Plymouth's waters and the safeguarding of the waterfront from coastal flooding. | The change separates the infrastructure element of the provision from the flooding provision; the only new content is a reference to surface water management which in any case would be required by DEV37. |
| AM68 | M68<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | 6. Retention of the small harbour and the site's slipways and marine recreational facilities.  | Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.   |
| AM69 | M69<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | 7. Optimising Enhancing the natural spaces of the site, and protecting the city and coastal views from the site, for the enjoyment of both local people and visitors.  | The modifications are considered to be helpful clarifications.  |
| AM70 | M70<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | 8. Design and juxtaposition of uses that responds to the continued and expanded operation of the Millbay ferry port, with appropriate noise mitigation measures provided in development.   | Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.   |
| AM71 | M71<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | 10. Public art and other Appropriate measures to celebrate the military heritage of the site.  | Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.   |
| AM72 | M72<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32 | 12. Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the existing area.   | These provisions would be moved to front end of policy (see other modifications identified for this policy)   |
| AM73 | M73                    | Strategy for  | 13. Delivery of an access strategy to ensure that  | Although it is not strictly necessary, we are happy to  |

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|      | (EXC10A)               | Plymouth Policy Area – Policy PLY32  | the transport impacts of the development are appropriately managed and mitigated. , having regard also to the operation of the port.  | accommodate the deletion of this text as requested<br>by MoD/DIO which can be removed without affecting<br>the substance of the provision.                        |
| AM74 | M74<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY32  | 14. A good quality pedestrian and cycling access route, to and as close to the waterfront perimeter of the site as practicable, along the site's whole waterfront through Millbay Port, and around the coast to Devil's Point, as part of linking to and enabling the extension of the South West Coast Path and National Cycle Network Route 27. | The simplification of text can be accommodated without affecting the substance of the provision.  |
| AM75 | M75<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY33  | NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.  | These requirements would have come from the implementation of Policy DEV37, but we are happy to amplify the site specific policy to confirm this to be that case. |
| AM76 | M76<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY35  | NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.  | These requirements would have come from the implementation of Policy DEV37, but we are happy to amplify the site specific policy to confirm this to be that case. |
| AM77 | M77<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY34  | NEW POINT Safeguarding of development and people from coastal flooding.   | These requirements would have come from the implementation of Policy DEV37, but we are happy to amplify the site specific policy to confirm this to be that case. |
| AM78 | HM28<br>(EXD5v)        | Polices PLY36,<br>PLY46, PLY56,<br>PLY58, PLY59,<br>PLY60, TTV11,<br>TTV15, TTV24,<br>TTV28, TTV29 | Revised heading for tabular site allocation policies:  'Policy considerations / things to be provided for by the development'   | Although not considered necessary for soundness, modification made to clarify the purpose of the heading.   |

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| AM79 | HM32<br>(EXD5vi)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY37 | 9. Upgrading of flood defences, maritime and harbourside infrastructure including: i Replacement of Sutton Harbour Lock Gate and Bridge. ii Improvements to West Pier. iii Completion of flood defences around Millbay. iv and strengthening Monitoring the condition of the breakwaters and other structures within Plymouth Sound and, in case of deterioration, identifying strategies to ensure the current benefits provided at the coast during coastal storms are retained. | The modifications provide greater clarity about the nature of the infrastructure reflecting more closely the descriptions in the Infrastructure Needs Assessment.   |
| AM80 | M81<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY38 | 1. The commercial centre will have the status of a district centre in Plymouth's retail hierarchy All proposals which form part of the development of the commercial centre or future changes to it which include retail floorspace will be determined and controlled in accordance with the application of the sequential and impact tests as provided for in Policy DEV16.   | Although it is not strictly necessary we are happy to accommodate this wording change.  |
| AM81 | M82<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY40 | NEW POINT The need for provision of open space and effective landscaping treatment having regard to the site's prominent position in the landscape setting of the area.  | Although it is not strictly necessary we are happy to accommodate this wording change. These matters would be picked up in any case through the application of the appropriate DEV policies – in particular through DEV20.2 and 5, and DEV24. |
| AM82 | M83<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –                 | Land at Woolwell Provision is made for in the order of 2,000 new homes (about 1,880 1,560 of which are anticipated to come forward within the  | The figure of 1,560 was published in the PPA housing trajectory in TP3F – see Table PPA 1 (last row of the details on Page 11. The text deletion is linked to the   |

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|      |                              | Policy PLY44  | plan period), with none occupied until the A386 Woolwell to the George Junction Transport Scheme has been implemented.  | proposed change to point 2 below.  |
| AM83 | M84<br>modified<br>(EXC10Ai) | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY44<br>(correction) | 2. The main access arrangements to the development must are to be agreed and delivered prior to the commencement of development the main construction works and delivered commensurately with the associated phase of the development. Additionally, there should be no occupation of new homes until the A386 Woolwell to the George Junction Transport Scheme has been implemented, with the exception of where this can be accommodated without resulting in a severe impact on the operation of the local road network. | Although not strictly necessary, this modification provides clarification given the complex nature of the delivery of a project of this scale. It also moves text from the front end of the policy to make it clearer, in modified form to provide a caveat which is consistent with the wider policies of the plan in relation to managing transport impacts. |
| AM84 | M85<br>(EXC10A)              | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY44                 | 4 i Delivery of a new Community Park and that will form part of a network   | Correction of grammatical error.   |
| AM85 | M86<br>(EXC10A)              | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY44                 | 4 vii Incorporate significant levels of biodiversity enhancement works to Mitigate the impacts of the development on biodiversity and incorporate biodiversity enhancement measures.  | The modifications are considered to be helpful clarifications, consistent with the provisions of DEV28.  |
| AM86 | M87<br>(EXC10A)              | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY44                 | 5. Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the area, including a new primary school and appropriate contributions to mitigate the impact of the development on secondary  | This modification applies what would be required through the provisions of Policies DEV32 and DEL1 to this policy.   |

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|      |                        |  | schools in Plymouth.  |   |
| AM87 | M88<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY46.13  | NEW POINT Retention of the existing playing pitches, or re-provision to an equivalent or higher standard within the overall site.                       | Although the allocation is for employment <u>and</u> sports pitches this modification adds some clarity about how the sports part of the allocation can be delivered, and would in any case be a requirement of DEV3 and 4. |
| AM88 | M338<br>(EXC10Ai)      | Strategy for Plymouth Policy Area – Opportunity Sites within Derriford and Northern Corridor Growth Area | Remove section from the JLP   | The section can be removed as it duplicates provisions of PLY38.  |
| AM89 | M89<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY48  | NEW POINT Provision of sustainable urban drainage systems and blue/green corridors to ensure the control of pollution and the management of flood risk. | This modification reflects a provision of the strategic masterplan and is internally consistent with wider policies of the plan relating to drainage and water management, particularly DEV37.                              |
| AM90 | M339<br>(EXC10Ai)      | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY48  | 3. Delivery of 200 hectares of Community Park (including 70 hectares of tree planting), as provided for in Policy PLY49.                                | This is considered a helpful cross reference.   |
| AM91 | M90<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY48  | 7 ii Health and community facilities, including a town hall, library, youth centre and multi-faith building / places of worship.                        | Although it is not strictly necessary we are happy to accommodate this wording change, which in any case is consistent with SPT2.9  |
| AM92 | HM12                   | Strategy for   | Sherford Community Park will provide a new high   | This modification does not change the context of the  |

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|      | (EXD5II)               | Plymouth<br>Policy Area –<br>Policy PLY49  | quality multi-functional green space for the residents of the new community and the surrounding neighbourhoods. Any significant changes to the approved boundary will need to be supported by a revised Sherford strategic masterplan as provided for in Policy PLY48. It will be a minimum of 200ha and will reinforce the eastern boundary for the new community,                 | policy, it merely acknowledges that for very large scale projects changes do occur. This point is already acknowledged in relation to PLY48, which provides for the eventuality of changes to Sherford and a revised strategic masterplan.   |
| AM93 | M340<br>(EXC10Ai)      | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY51<br>and<br>consequential<br>amendment | Policy PLY51 Land at Langage is allocated for employment development in Use Classes B1b & c, B2 (industrial) and B8 (warehousing and distribution), as an extension to the existing strategic employment site. Provision is made for about 243,000 247,300 sq.m. of employment floorspace  Para 4.220 Taken together the Eastern Corridor Growth Area provides for 7,043 new homes, | This corrects an error in the calculation of potential floorspace as set out in Matter statement.  |
|      |                        |  | 325,625- 321,325 sq.m. of employment floorspace   |  |
| AM94 | M91<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY53                                      | 7. A form of development which visually makes a positive contribution to the wider historic landscape setting and the setting of the designated Boringdon Arch.   | The modification is considered to provide helpful specificity about the particular assets the provision relates to. The landscape setting is an historic setting, of which the Boringdon Arch is a major features, as supported by the plan's landscape assessment (EN27) and historic environment assessment (HE4). |
| AM95 | M92                    | Strategy for   | d. Flood mitigation measures to ensure  | The modification merely explains the purpose of the  |

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|       | (EXC10A)               | Plymouth Policy Area – Policy PLY56.4                       | development is safe and does not increase flood risk elsewhere.   | provision, consistent with the wider policies of the plan, particularly DEV37.  |
| AM96  | M93<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY56.4 | NEW POINT Investigation and remediation of contaminated land.   | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Environment Agency. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2. |
| AM97  | M94<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY56.5 | c. Flood mitigation measures to ensure development is safe and does not increase flood risk elsewhere.  | The modification merely explains the purpose of the provision, consistent with the wider policies of the plan, particularly DEV37.  |
| AM98  | M95<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY56.5 | NEW POINT Investigation and remediation of contaminated land.   | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Environment Agency. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2. |
| AM99  | M96<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY58.2 | NEW POINT Enabling uses could be acceptable provided that they are of a scale and nature that complement but do not prejudice the sporting use of Home Park and the wider recreational use of Central Park. | This modification is considered helpful clarification of the primary provision of the policy. The sporting and recreational uses would in any case be protected by PLY19, DEV3 and DEV29.   |
| AM100 | M97<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY58.9 | b. Contamination remediation. Investigation and remediation of contaminated land.   | The amended wording has the same effect as the original.  |

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| AM101 | M98<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY58.12 | b. Delivery of a sustainable urban drainage solution to provide an improvement to surface run off rates-to and from the site.  | The modification is considered to provide helpful clarification and does not change the context of the policy.   |
| AM102 | M99<br>(EXC10A)        | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY58.13 | NEW POINT Flood resistant and resilient design to address existing surface water issues.   | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Environment Agency. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV37.         |
| AM103 | M100<br>(EXC10A)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY58.18 | a. Protection and enhancements to the existing sports provision and associated sports and community facilities. The re-provision and enhancement of the playing pitches and associated infrastructure must be delivered-secured in advance of commencement of works on as part of the planning consent the retail store and completed prior to the opening of the store. | The amended wording still achieves the same outcome but provides greater clarity.  |
| AM104 | M101<br>(EXC10A)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY59.11 | NEW POINT A sensitively designed landscape scheme to minimise the impact of nearby highly graded heritage assets.  | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Historic England. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV21 and DEV22. |
| AM106 | M102<br>(EXC10A)       | Strategy for<br>Plymouth  | 120 94 homes   | The modification of estimated housing capacity responds to further work on the historic environment.   |

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|       |  | Policy Area –<br>Policy<br>PLY59.12                             |   |   |
|       | M103<br>(EXC10A) &<br>HM39<br>(EXD5vi) | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY59.12 | a. Provide a buffer along the southern boundary of the site to safeguard the setting of neighbouring heritage assets, including Ernesettle Battery east extension, St Budeaux church and yard, and Agaton Farmhouse. Conservation and enhancement of the area's historic environment, as supported by a detailed heritage and visual landscape assessment, including:  i. Retaining and where possible opening up key views and partial views of heritage assets, from outside and within the site, including St Budeaux parish church and embankment and Agaton Fort.  ii. Taking account of existing built boundaries and following existing lines so as to not impact on the setting of the church or encroach onto land within its settings.  iii. Taking account of the presence of Ernesettle Battery so as not to impact upon its setting or encroach on to land within its setting. | The modifications provide amplification of how development will meet the requirements of policies DEV21 and DEV22, and reflect the evidence base associated with this site. |
| AM107 | M104<br>(EXC10A)                       | Strategy for<br>Plymouth<br>Policy Area –                       | d. Development must include delivery of high quality publicly accessible greenspace to mitigate for the loss of greenspace and provide for  | The modification simply adds further clarification of the benefits of the provision to deliver public access.   |

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|       |                        | Policy<br>PLY59.12  | enjoyment of the historic environment.  |  |
| AM108 | M105<br>(EXC10A)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY59.18 | NEW POINT Retention of existing playing pitch.  | Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan – particularly DEV3 and DEV4 - and is provided for in the planning consent for the site. |
| AM109 | M106<br>(EXC10A)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY60.2     | NEW POINT Provision of safe pedestrian access / egress route in times of flooding.  | Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan – particularly DEV37 - and is provided for in the planning consent for the site.         |
| AM110 | M107<br>(EXC10A)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY60.6     | NEW POINT . Measures to ensure development is safe and does not increase flood risk elsewhere.  | Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan, particularly DEV37.   |
| AM111 | M108<br>(EXC10A)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY60.7     | NEW POINT Measures to ensure development is safe and does not increase flood risk elsewhere.  | Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan, particularly DEV37.   |
| AM112 | M109<br>(EXC10A)       | Strategy for<br>Plymouth<br>Policy Area –<br>Policy PLY60.8     | NEW POINT Measures to ensure development is safe and does not increase flood risk elsewhere.  | Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan, particularly DEV37.   |
| AM113 | M110                   | Strategy for<br>Plymouth<br>Policy Area –<br>Policy             | a. Development to take place in a manner which does not harm and instead enhances the setting of the nearby heritage assets, including the Boringdon Arch, as demonstrated by appropriate | The modification is considered to provide helpful specificity about the particular assets the provision relates to.  |

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|       |                        | PLY60.11   | environmental and heritage assessments.   |  |
| AM114 | M111                   | Strategy for<br>Plymouth<br>Policy Area –<br>Policy<br>PLY60.11  | d. Good connections to the adjacent Coypool development (PLY53), will be required the Plym Valley cycleway and adjacent strategic greenspace areas to be provided.  | The modification is considered to provide helpful clarification.   |
| AM115 | M113<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area –<br>Strategic<br>Outcome for<br>'our strategic<br>approach to<br>development<br>in SW Devon' | South West Devon's towns, villages and countryside communities will have contributed to achieving a prosperous and sustainable subregion with a diverse rural economy, housing stock and rural services that meet the needs of its population. The integrity of South West Devon's rural and urban landscapes countryside will remain intact, with strong rural communities that reflect the traditions of the rural historic landscape. The rural and urban landscapes countryside will continue to enjoy national recognition and contribute to a thriving rural economy through investment in traditional industries and innovative diversification. | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Historic England.                 |
| AM116 | M114<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area –<br>Strategic<br>Objective SO6   | Protecting, conserving Preserving and enhancing the natural beauty of south west Devon's countryside, protecting the countryside from inappropriate development, and maximising our environmental assets.   | The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by several parties.                  |
| AM117 | M115<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy  | Smaller villages, Hamlets and the Countryside -<br>where development will be permitted only if it can<br>be demonstrated that it fully to support the   | The modification is considered to provide helpful clarification and is consistent with the wider provisions of the plan (eg paras 3.10 and 5.153 which |

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|       |                        | TTV1   | principles of sustainable development and sustainable communities (Policies SPT1 and 2), with thriving village networks, and positively contributes in all other respects to a sustainable and beautiful countryside.   | references the wider role of networks)  |
| AM118 | HM23<br>(EXD5v)        | Strategy for<br>TTV Policy<br>Area –para<br>5.11     | Outside of the settlements and in the wider rural area, it is significantly more challenging to meet the requirements of sustainable development. Paragraph 54 if 55 of the NPPF highlights that isolated homes in the countryside should be avoided, and only allowed where there are special circumstances. This is considered further in Policy TTV30.                           | Correction of error   |
| AM119 | HM24<br>(EXD5v)        | Strategy for<br>TTV Policy<br>Area –Policies<br>TTV2 | The LPAs will support development proposals in the Thriving Towns and Villages Policy Area which reinforce the sustainable settlement hierarchy and which deliver a prosperous and sustainable pattern of development. In addition to the provisions of Policies SPT1 and SPT2, specific attributes objectives of rural sustainability to be supported through development include: | This is merely a change in terminology, without any change to the context of the policy.                                |
| AM120 | M116<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV2  | 5. The delivery of sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and respect the character of the countryside and historic settlements.  | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Historic England. |
| AM121 | M117<br>(EXC10A)       | Strategy for TTV Policy                              | ADDITIONAL POINT The delivery of natural infrastructure, where appropriate, alongside new   | Although it is not strictly necessary we are happy to accommodate this modification sought by Natural                   |

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|-------|------------------------|--|---|--|
|       |                        | Area – Policy<br>TTV2  | development.  | England which is consistent with the main town spatial priority policies (TTV4.8; TTV7.8; TTV12.7; TTV16.10; TTV25.5;) and supported by the sustainable development focus of the plan (eg SPT1.3ii; SPT2.7). |
| AM122 | M118<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para.<br>5.17                 | Being able to travel on public transport from the rural areas to larger settlements to access services and employment continues to present challenges, with the viability of many rural services difficult to achieve As such, proposals that contribute to securing rural public transport services will be encouraged, with developer contributions sought where appropriate. | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Devon County Council.  |
| AM123 | M119<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area –<br>Strategic<br>Objective SO7 | 4. Protecting and enhancing local distinctiveness and historic character of the Main Towns.   | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Historic England.  |
| AM124 | M120<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV3                | 4. Connectivity across and along the River Dart will be improved by increasing the number of ferry services and their frequency, including an improved service between Noss Marina and Dartmouth (this will be delivered through the Noss on Dart development).   | The modification removes what is arguably an over precise provision.   |
| AM125 | M121<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.23                  | The plan directs the majority of development to the most sustainable locations, which are the six Main Towns Transport infrastructure is a key element and the projects identified will maintain links between the towns and between them and   | The modification sought by Devon County Council provides a sharper focus for the narrative that follows Policy TTV3.   |

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| AM126 | HM25                   | Stratogy for   | the lower order settlements, as well as supporting sustainable growth. The growth and function of lybridge, Tavistock, Totnes and Okehampton in particular are constrained by the highway network, necessitating highway, public transport, cycling and walking measures to alleviate congestion and encourage greater use of alternatives modes of transport to the private car. | The modification does not propose modifications to  |
| AM126 | (EXD5v)                | Strategy for<br>TTV Policy<br>Area –Policies<br>TTV4, TTV7,<br>TTV12, TTV16,<br>TTV20, TTV25 | Retain as statements of local spatial priorities, not as policies   | The modification does not propose modifications to the content of those spatial priorities except where identified by separate modifications. It is merely referring to the lists of priorities in a different way. |
| AM127 | M122<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.31  | The success of creating new communities in this area will depend upon the quality of connections between the lower town and Townstal, and how the new development relates to the AONB landscapes. In this respect, the protection of the AONB including its setting, in accordance with Policy DEV27, is a key priority for the area.   | Although it is not strictly necessary we are happy to accommodate this wording change as requested by S Devon AONB.   |
| AM128 | HM26<br>(EXD5v)        | Strategy for<br>TTV Policy<br>Area –Policies<br>TTV5   | Land at Cotton is allocated for residential led mixed-use development. Provision is made for in the order of 450 new homes and 10,800 sqm of employment land floorspace (Use Classes B1).   | Correction of error   |
| AM129 | M123<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy  | 4. Strategic landscaping, open space, and tree planting to address the scale and prominence of the site   | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Natural England, and would have been sought   |

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|       |                        | TTV5  |   | through the application of other policies of the plan including particularly DEV20 and DEV24.  |
| AM130 | M124<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV5                                   | 5. A scale, density, design and southern extent of development which is not overly prominent when viewed from the surrounding countryside.  | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Natural England, which is consistent with the requirements of DEV20. |
| AM131 | M125<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV5                                   | NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.  | Although not strictly necessary, we are happy to accommodate this minor modification requested by Natural England which is consistent with DEV2.4's requirements.          |
| AM132 | HM34<br>(EXD5vi)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 and<br>consequential<br>amendment | Policy TTV6 Land at Noss-on-Dart is allocated for mixed-use development including employment (Use Classes B1, and B2 and B8), commercial, education, a hotel, retail and enabling residential development. Provision is made for in the order of 100 130 new homes. A comprehensive redevelopment scheme should provide for the following:  1. Improved-Provision of-existing educational facilities  7. Careful-Consideration and investigation of opportunities to ensure the future of retain undesignated heritage assets on site.  8. Demolition of buildings and remediation Remediation of land. | The modification brings improved wording and updates the development quantum and mix based on the current planning permission.   |

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|       |                        |   | <b>Para 5.40</b> Taken together, Dartmouth and Noss provide for 550 580 new homes  |  |
| AM133 | M126<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 | 2. Retention and improved provision of existing educational facilities.  | The modification is considered to provide helpful clarification and does not change the context of the policy.   |
| AM134 | M127<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 | 6. High quality design, which must take account of the location, wooded character, scale, massing, lighting and the site's sensitive setting in the AONB,  | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Natural England, which is consistent with the requirements of DEV20.   |
| AM135 | M128<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 | 7. Careful consideration and investigation of opportunities to ensure the future of undesignated heritage assets on site, and that the Scheduled Monument and its setting is conserved and enhanced.   | Although not strictly necessary, we are happy to modify this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV21 and DEV22. |
| AM136 | M129<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 | 9. A site specific mitigation plan to ensure all new development does not have any negative impact adverse effects on the greater horseshoe bats species and their flightpaths strategic flyways within the protected South Hams SAC bat consultation zone.  | The modification is considered to provide helpful clarification and does not change the context of the policy.   |
| AM137 | M130<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 | 10. Appropriate flood risk mitigation and water management measures. A sequential approach to the layout and design of development and incorporation of flood resistance and resilience measures for any development that has to be located in a flood zone. | The modification is considered to provide helpful clarification consistent with other provisions of the plan, particularly DEV37.  |

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| AM138 | M131<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 | NEW POINT Water quality management measures to protect the surrounding estuary.  | Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan, particularly DEV2 and DEV37.   |
| AM139 | M132<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV6 | NEW POINT Avoiding the loss of inter-tidal habitat; where loss cannot be avoided, it must be fully mitigated and/or compensated.   | Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan., particularly DEV28 and DEV37. |
| AM140 | M133<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.35   | Noss on Dart Marina is a locally important employment site that lies within the Parish of Kingswear In order for this to happen it is accepted that this site for housing development in the order of 100 dwellings is appropriate to ensure that the wider community benefits from redeveloping in this location can be realised. It is expected that the scale and form of the development proposed will be guided by a design code. Limited accessibility of the site is noted, although conversely redevelopment provides an opportunity to enhance ferry links between Dartmouth and Kingswear. | The modification relates to the planning application process and has no impact on the policy itself.  |
| AM141 | HM41<br>(EXD5vii)      | Strategy for<br>TTV Policy<br>Area – Figure<br>5.3  | To be amended to reflect more accurately the location / nature of development and to be clearer on transport issues  | The modification simply makes the diagram at bit clearer in the context of what is written in the JLP.  |
| AM142 | M134<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy         | 4. Maintaining Improving the existing retail offer, protecting the integrity of the town centre and enhancing its character.   | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Ivybridge Town Council.   |

| Ref   | Past ref /<br>document | Part of JLP<br>(Submission<br>version)<br>affected                                    | Additional modification  | Reason why the modification is considered to be minor   |
|-------|------------------------|---|--|---|
| AM143 | M135<br>(EXC10A)       | TTV7 Strategy for TTV Policy Area – Policy TTV7                                       | 8. Ensuring appropriate infrastructure is delivered alongside new development, including community facilities identified in Policy INP5 of the lyybridge Neighbourhood Plan.   | This amplification is now able to be made given the status of the Ivybridge Neighbourhood Plan, which was 'made' on 7 December 2017.  |
| AM144 | HM35(EXD<br>5vi)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV8 and<br>consequential<br>amendment | Policy TTV8 Land to the east of Ivybridge is allocated for a residential led mixed-use development. Provision is made for in the order of 540 new homes and 10,400 4,600 sq m of employment space (Use Classes B1)  Para 5.51 Taken together, Ivybridge provides for in the order of 1,079 new homes and 10,400 4,600  | The modification updates the development quantum based on the current planning permission.  |
| AM145 | M136<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV8                                   | sqm of employment floorspace.  3Strategic landscaping to A landscape strategy which addresses the site's scale and prominence and the edges of the development, and to help mitigate any adverse visual impact on Dartmoor National Park, and to soften the edges of the development onto the undeveloped countryside. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.              |
| AM146 | M137<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV8                                   | 5. A quality form of development which integrates with the existing housing, and provides a design and density that is not prominent when viewed from the Dartmoor National Park.  | Although it is not strictly necessary we are happy to accommodate this wording change as requested, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27. |
| AM147 | M138<br>(EXC10A)       | Strategy for TTV Policy   | Land to the east of lyybridge, at Filham, is allocated for housing. Provision is made for in the   | This is the correction of a drafting inconsistency with other policies.   |

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|       |                        | Area – Policy<br>TTV9                                  | order of 200 new homes. Development should provide for and <del>consider</del> -the following:  |  |
| AM149 | M139<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV9    | 4. Strategic landscaping to the site boundaries, and the creation of a landscape framework throughout the site. help mitigate any adverse visual impact on Dartmoor National Park and to soften the edges of the development onto the undeveloped countryside. The scale, character, density and design of development should ensure that it is not overly prominent when viewed from the surrounding countryside, paying particular regard to views towards and from Dartmoor.                                     | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.   |
| AM150 | M141<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV10   | 4. Strategic landscaping to the site boundaries help mitigate any adverse visual impact on Dartmoor National Park, and to soften the edges of the development onto the undeveloped countryside and provide visual containment of the development in views from Dartmoor National Park. The scale, design, density, and the northern and western extents of development should ensure that it is not overly prominent when viewed from the surrounding countryside, paying particular regard to views from Dartmoor. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.   |
| AM151 | M143<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV11.1 | NEW POINT Flood resistant and resilient design, without increasing flood risk elsewhere.  | Although it is not strictly necessary the modification the new point has been sought by the Environment Agency, is consistent with the requirements of other policies of the plan (especially DEV37) and in any case is provided for in the planning consent for the site. |

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|-------|------------------------|--|--|---|
| AM152 | M144<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV11.1 | NEW POINT Leat Management Plan to ensure the proper maintenance of the leat and mill pool, to manage flood risks and protect fish species.   | Although it is not strictly necessary the modification the new point has been sought by the Environment Agency, is consistent with the requirements of other policies of the plan (especially DEV28 and DEV37) and in any case is provided for in the planning consent for the site.    |
| AM153 | M145<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.53      | It is important for the future self-sufficiency of Kingsbridge that appropriate levels of residential and employment growth are provided for within the town. It is fully recognised that the town has a close relationship with the AONB, and it is considered that the sites allocated within Kingsbridge provide the best opportunities to meet the future needs of the town whilst having the least impact on the special qualities and character of the AONB. Development within Kingsbridge will need to ensure that water quality issues within the Salcombe to Kingsbridge SSSI are not exacerbated. | Although it is not strictly necessary we are happy to accommodate this wording change as requested by Natural England, which in any case would have been provided for by DEV28 and DEV37.   |
| AM154 | HM27<br>(EXD5v)        | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV12   | NEW POINT Recognising the important role of key road links the A381 link to Totnes and the need to maintain and improve public transport provision.  | Although it is not strictly necessary we are happy to support this locally added priority, which was modified during the hearing sessions. It is not needed for reasons of soundness and is consistent with the plan's desire to promote sustainable travel (eg SPT9, SPT10 and DEV31). |
| AM155 | HM36<br>(EXD5vi)       | Strategy for<br>TTV Policy<br>Area – Policy            | Policy TTV13  Land at The Quayside is allocated for mixed-use re-development, including employment,  | The modification reflects an update position based on masterplanning and consultation undertaken since the JLP was submitted.   |

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|       |                        | TTV13 and consequential amendment                    | commercial, residential and community uses. Provision is made for in the order of 100 60 new homes and 200 sq.m. of employment floorspace (Use Classes B1)  |  |
|       |                        |  | <b>Para 5.61</b> Taken together, Kingsbridge provides for 395 355 new homes   |  |
| AM156 | M147<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV13 | 2. A high quality design for this estuary gateway site which reflects the quality and character of the South Devon AONB, conserves and enhances the character and provides for enhanced public realm and better connectivity for pedestrians and cyclists to the town centre and estuary. | The modification merely amplifies in the policy as to why high quality design is important, which is entirely consistent with other policies in the plan, especially DEV20 and DEV27.                                |
| AM157 | M148<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV13 | 5. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site without exacerbating water quality issues within the Salcombe to Kingsbridge SSSI and are designed to deliver landscape, biodiversity and amenity benefits.                          | The caveat would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.  |
| AM158 | M149<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV13 | NEW POINT Sufficient space to allow the retention of a tree canopy within and surrounding the site to conserve the green character of Kingsbridge in this area.   | Although it is not strictly necessary we are happy to include the modification requested by Natural England, which is consistent with the provisions of DEV20, DEV24 and DEV30.                                      |
| AM159 | M150<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV13 | NEW POINT Investigation and remediation of contaminated land.   | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2. |

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| AM160 | M151<br>(EXC10A)                      | Strategy for<br>TTV Policy<br>Area – para<br>5.55    | The Quayside area is a naturally beautiful setting at the head of the Kingsbridge estuary, providing a setting to heritage assets with informal open space and a focal point for residents and tourists alike A well designed comprehensive redevelopment scheme should provide a focus for the estuary, accessibility and links to the rest of the town. Maintaining mature trees and restricting height of new buildings to below tree level could help to mitigate against potential harm to heritage assets. | The modification is considered to provide helpful clarification and does not change the context of the policy.   |
| AM161 | M152<br>(EXC10A) &<br>HM29<br>(EXD5v) | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV14 | 2. Strategic landscaping to within address the scale and prominence of the site boundaries and the creation of a landscape framework throughout the site, to mitigate any adverse visual impact on the AONB, and to soften the edges of the development which borders the undeveloped countryside. The scale, design, density and northern extents of development should ensure that development is congruous with the setting adjacent settlement edge when viewed from the surrounding countryside.            | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27. |
| AM162 | M153<br>(EXC10A)                      | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV14 | 4. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site without exacerbating water quality issues within the Salcombe to Kingsbridge SSSI and are designed to deliver landscape, biodiversity and amenity benefits.   | The caveat would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.  |

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|-------|------------------------|--|--|---|
| AM163 | M154<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV14   | NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.   | Although not strictly necessary, we are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.  |
| AM164 | M155<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV15.1 | a. Appropriate Open space and strategic landscaping to the western edge of the site address the prominence and scale of development, and the creation of a landscape framework throughout the development. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.                            |
| AM165 | M156<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV15.1 | NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.   | Although it is not strictly necessary we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2, DEV20, DEV24 and DEV27. |
| AM166 | M157<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV15.1 | NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.   | The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.   |
| AM167 | M158<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV15.2 | a. Appropriate Open space and strategic landscaping to the western edge of the site address the prominence and scale of development, and the creation of a landscape framework throughout the development. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.                            |
| AM168 | M159<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV15.2 | NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.   | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27.                      |

| Ref   | Past ref /<br>document | Part of JLP<br>(Submission<br>version)<br>affected     | Additional modification   | Reason why the modification is considered to be minor  |
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| AM169 | M160<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV15.2 | NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.  | The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.  |
| AM170 | M161<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV16   | 4. Enhancing the historic character and vitality of the town. centre  | The modification requested by Historic England, whilst unnecessary, is considered to provide helpful clarification.  |
| AM171 | M162<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV16   | 7. The delivery of a new primary school in the east of the town, and the relocation of the post 16 provision at Okehampton College, and the expansion of existing schools in the town.  | Given the advice of the LEA, we are happy to modify<br>the policy provision – reflecting what in any case<br>could have been negotiated through planning<br>applications pursuant to Policies DEV32 and DEL1.          |
| AM172 | M163<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV16   | 9. Working with relevant authorities to look for appropriate solutions to manage traffic flow in and around the town, including exploring opportunities to deliver a town centre access road and delivery of a link road between Exeter Road and Crediton Road.                               | Although not strictly necessary, we are happy to agree with this proposed modification which also has the support of the Local Highway Authority, and can be recognised as a local priority.                           |
| AM173 | M164<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV17   | 1. Strategic and structural landscaping within and surrounding the site, a site layout and building design to address the site's scale and prominence and to help mitigate any adverse visual impact on the Dartmoor National Park, and to soften the edges onto the undeveloped countryside. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27. |
| AM174 | M165<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV18   | 1. Strategic landscaping and open space within and surrounding the site to address the site's scale and prominence, and to mitigate any adverse visual impact on the Dartmoor National  | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and        |

| Ref   | Past ref /<br>document | Part of JLP<br>(Submission<br>version)<br>affected           | Additional modification  | Reason why the modification is considered to be minor  |
|-------|------------------------|--|--|--|
|       |                        |  | Park, and to soften the development's edges with the undeveloped countryside. The scale, materials, design and extents of development should ensure that it is not overly prominent when viewed from the surrounding countryside, improving the eastern edge of Okehampton.  | DEV27.   |
| AM175 | M167<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV19         | 1. Strategic landscaping within and bounding the site to address the site's scale and prominence and to help mitigate any adverse visual impact on the Dartmoor National Park. , and to soften the edges onto the undeveloped countryside to fully The layout, design, scale and materials should recognise the rural character of the site. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27. |
| AM176 | M168<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV20         | 5. The delivery of a new primary school in the west of the town and expansion of existing schools.   | Given the advice of the LEA, we are happy to modify<br>the policy provision – reflecting what in any case<br>could have been negotiated through planning<br>applications pursuant to Policies DEV32 and DEL1.          |
| AM177 | HM45<br>(EXD5vii)      | Strategy for<br>TTV Policy<br>Area – Policies<br>TTV20,21,22 | Policy TTV20  9. Ensuring that all development, singularly or cumulatively, will not negatively impact on the ability of the relevant authorities to improve air quality within the Dolvin Road AQMA.  Policy TTV21  10. An appropriate strategy to mitigate for any impact on the Dolvin Road AQMA.   | Correction of an error that has come to light. There is no Dolvin Road AQMA; this was a matter previously under consideration but no designation has been made.  |
|       |                        |  | Policy TTV22   |  |

| Ref   | Past ref /<br>document | Part of JLP<br>(Submission<br>version)<br>affected                                     | Additional modification   | Reason why the modification is considered to be minor   |
|-------|------------------------|--|---|---|
|       |                        |  | 6. An appropriate strategy to mitigate for any impact on the Dolvin Road AQMA.  |   |
|       |                        |  | Policy TTV24.5  |   |
|       |                        |  | c. An appropriate strategy to mitigate for any impact on the Dolvin Road AQMA.  |   |
| AM178 | M170<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV21                                   | 5. Strategic landscaping and open space to address the site's scale and prominence, to help mitigate any adverse visual impact on the AONB, and to soften the edges of the development onto the undeveloped countryside. The scale, density, design, materials and southern and western extents of development should ensure that it is not overly prominent when viewed from the town and surrounding countryside, and the World Heritage Site and Dartmoor National Park. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.  |
| AM179 | M171<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV21                                   | NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.  | Although not strictly necessary, we are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.  |
| AM180 |                        | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV22 and<br>consequential<br>amendment | Policy TTV22 Land at Plymouth Road is allocated for a mixeduse development. Provision is made for in the order of 250 300 new homes and 18,600 sq.m. of employment (Use Class B1). Development should provide for the following:  1. A strategic landscaping including a 90m buffer along the west of the site, to be informed by a   | The modification updates development potential figures. The changes in point 1 are not strictly necessary, but do provide helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20. |

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|       |                        |   | Landscape and Visual Assessment, in order to address the site's scale and prominence, to help mitigate any adverse visual impact on the AONB, and to soften the edges of the development onto the undeveloped countryside. The scale, density, materials, design and southern extents of development should ensure that it is not overly prominent when viewed from the town and surrounding countryside                                   |   |
|       |                        |   | <b>Para 5.95</b> Taken together, Tavistock provides for 1,143 1,193 new homes  |   |
| AM181 | M173<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV22                    | NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.   | Although not strictly necessary, we are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.  |
| AM182 |                        | Strategy for<br>TTV Policy<br>Area – para<br>5.91 after<br>Policy TTV22 | 5.91 The design and delivery framework for this policy is amplified in the Tavistock Masterplan Supplementary Planning Document. The land to the north of the lane which bisects the allocation adjoins an existing commercial area on Plymouth Road and is suitable principally for new employment uses, predominantly Use Class B1. The land to the south of the lane which bisects the allocation is the most suitable for the housing. | The SPD is only of limited relevance to the JLP policy and this para is therefore unnecessary. The new text provides further detail to explain how the policy is implemented across incorporates some text to clarify what the policies map already anticipates in relation to which parts of the site are best suited to housing and employment led developments |

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|       |                        |  | Other commercial uses can also be considered as part of a mixed use development for the site. The Councils will work proactively with the landowner and developers to deliver the development objectives set out in the policy, including proactive measures as necessary facilitate the efficient provision of infrastructure and to secure funding streams for development of the employment element. |  |
| AM183 | M174<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV24.1 | NEW POINT Open space and strategic landscaping to the west of the site and the creation of a landscape framework throughout the development.  | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20, DEV24 and DEV27.       |
| AM184 | M175<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV24.1 | NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.  | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2, DEV20, DEV24 and DEV27. |
| AM185 | M176<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV24.1 | d. Provision and maintenance of a surface water drainage scheme.  | Agree that this can be deleted as covered by general policies of plan.   |
| AM186 | M177<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV24.2 | a. Provision and maintenance of a surface water drainage scheme.  | Agree that this can be deleted as covered by general policies of plan.   |
| AM187 | M178                   | Strategy for   | NEW POINT Strategic landscaping to the northern   | Although not strictly necessary, we are happy to   |

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|       | (EXC10A)               | TTV Policy<br>Area – Policy<br>TTV24.2                 | site boundaries and the retention and enhancement of existing hedgerows throughout the site.   | include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20, DEV24 and DEV27.  |
| AM188 | M179<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV24.2 | NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.   | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2, DEV20, DEV24 and DEV27. |
| AM189 | M180<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV24.5 | c. An appropriate strategy to mitigate for any impact on the Dolvin Road AQMA and on the setting of Dartmoor National Park.  | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV27.                        |
| AM190 | M181<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV24.5 | NEW POINT Careful consideration of extent, scale and appearance of development to minimise local landscape impacts.  | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20, DEV24 and DEV27.       |
| AM191 | M182<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.98      | Totnes is one of the principal heritage attractions of the region. The town # is characterised by its distinct identity and its historic town centre, and the quality of the surrounding landscape, extending downstream towards Dartmouth | Although it is not strictly necessary we are happy to accommodate this wording change as requested.  |
| AM192 | M183<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV27   | 7. A high quality form of development which integrates with the existing area and the setting of nearby heritage assets.   | The modification is considered to provide helpful clarification, consistent with the provisions of DEV21 and DEV22.  |

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| AM193 | M184<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV27               | NEW POINT Investigation and remediation of contaminated land.  | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2.                                    |
| AM194 | M185<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV28.4             | NEW POINT Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.   | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20, DEV21 and DEV22.                  |
| AM195 | M186<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV28.5             | a. Delivery in accordance with the provisions of<br>the Community Right to Build Order (CRtBO),<br>including appropriate flood risk mitigation<br>measures (including improvements to the leat to<br>protect existing development downstream),<br>remediation of contaminated land and habitat<br>enhancement. | Although not strictly necessary, we are happy to include this modification which is consistent with the requirements of other policies of the plan, particularly DEV28 and DEV37, and in any case is provided for in the planning consent for the site. |
| AM196 | M187<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV28.5             | NEW POINT Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.   | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20, DEV21 and DEV22.                  |
| AM197 | M188<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area –<br>Strategic<br>Objective SO8 | NEW POINT Conserving and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.   | The modification although unnecessary is consistent with the historic environment policies of the plan, particularly DEV21 and DEV22.   |
| AM198 | M189                   | Strategy for   | <b>Bere Alston</b> sits within the heart of the Bere   | The modification is considered to provide helpful   |

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|       | (EXC10A)                      | TTV Policy<br>Area – para<br>5.117                              | Peninsula, and serves a wide range of small rural communities, farmsteads and rural businesses Any new development needs to be delivered sensitively, and with careful consideration given to the impact of development on the special qualities and character of the AONB and the Outstanding Universal Value of the World Heritage Site.   | clarification and does not change the context of these provisions of the plan.  |
| AM199 | M190<br>(EXC10A)              | Strategy for<br>TTV Policy<br>Area – new<br>para after<br>5.122 | Given the special qualities of the Dartington Estate, future redevelopment must be sensitive to its character and importance both locally and nationally. It is therefore worth particular mention that the form, scope, scale and design of development in Dartington must be informed by the detail contained by the Heritage Impact Assessment.   | The new paragraph seeks to reinforce the particular significance of the Dartington Estate, and does not affect the policy provisions for Dartington. (A main modification is however also proposed in relation to the Dartington estate). |
| AM200 | M191<br>modified<br>(EXC10Ai) | Strategy for<br>TTV Policy<br>Area – new<br>para after<br>5.126 | Additional primary school capacity may be needed during the plan period. Land to the south of Hatherleigh primary school was identified for this purpose in the West Devon Local Plan 2005 (Policy H45), and this will be an option for further consideration with Devon County Council. Should it be determined that additional land is required this will be identified through local planning documents linked to the provisions of Policy SPT12. | This new paragraph flags up the education capacity issues, which Hatherleigh development proposals will need to respond to – this in any case being a requirement of Policies DEV32 and DEL1.   |
| AM201 | M192<br>(EXC10A)              | Strategy for TTV Policy   | a. Layout, and design and location of structural landscaping to be guided by landscape   | Although it is not strictly necessary in that this would have been covered by DEV20 and DEV24, we are   |

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|       |                        | Area – Policy<br>TTV29.1                                | assessment.   | happy to accommodate this wording change as requested by Natural England.   |
| AM202 | M193<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.2  | a. Layout, <del>and</del> design and location of structural landscaping to be guided by landscape assessment. | Although it is not strictly necessary in that this would have been covered by DEV20 and DEV24, we are happy to accommodate this wording change as requested by Natural England. |
| AM203 | M196<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.11 | Mixed use - with homes and employment (Use Classes B1a, B2 and B8)  | The modification aligns the policy to the planning consent for the site.  |
| AM204 | M197<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.11 | d. Community Allotments.  | The modification aligns the policy to the planning consent for the site.  |
| AM205 | M198<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.11 | NEW POINT Contributions to expanding primary school capacity in the area.                                     | The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.  |
| AM206 | M199<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.12 | NEW POINT Contributions to expanding primary school capacity in the area.                                     | The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.  |
| AM207 | M200<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.13 | NEW POINT Contributions to expanding primary school capacity in the area.                                     | The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.  |
| AM208 | M201<br>(EXC10A)       | Strategy for TTV Policy                                 | NEW POINT Strategic landscaping and open space to the north and east of the site, linked to the               | Although it is not strictly necessary in that this would have been covered by DEV20 and DEV24, we are   |

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|       |                        | Area – Policy<br>TTV29.15                                   | open space to the north east of the site at West Barracks Road.   | happy to accommodate this wording change as requested by Natural England.   |
| AM209 | M202<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.17     | b. Layout, and design and landscaping to be guided by landscape assessment, with careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts. | Although it is not strictly necessary in that this would have been covered by DEV2, DEV20 and DEV24, we are happy to accommodate this wording change as requested by Natural England.   |
| AM210 | M203<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.18     | NEW POINT Contributions to expanding primary school capacity in the area.   | The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.  |
| AM211 | M204<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.19     | NEW POINT Strategic landscaping bordering the site.   | Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20 and DEV24. |
| AM212 | M205<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.19     | NEW POINT Careful consideration of the scale and appearance of the development, and the lighting of the site, to minimise wider landscape impacts.  | We are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2, DEV20, DEV24 and DEV27.                     |
| AM213 | M206<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.19     | NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.  | The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.   |
| AM214 | HM37<br>(EXD5vi)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.20 and | Policy TTV29.20 30 20 homes; 2,000 sq.m. employment floorspace  | The modification reflects an update position based on masterplanning and consultation undertaken since the JLP was submitted.   |

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|       |                        | consequential amendment                                 | Para 5.143 As set out in Policy TTV29, 63 43 new homes  |   |
| AM215 | M207<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.20 | b. Layout and design to be guided by landscape and heritage assessment, with careful consideration of scale and appearance of development and any ground engineering operations, to minimise wider landscape impacts  | Although it is not strictly necessary we are happy to accommodate these wording changes as requested. The new points would be picked up through DEV20, DEV24 and DEV27. |
| AM216 | M208<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.20 | NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.  | The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.                       |
| AM217 | M209<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.21 | a. Strategic landscaping to address the sites prominence, to help mitigate any adverse visual impact on the AONB, and to soften the edges of the development onto the undeveloped countryside. The scale, and design and density of development should ensure that it is not overly prominent when viewed from the surrounding countryside. | Although it is not strictly necessary we are happy to accommodate this wording change as requested, which in any case is consistent with DEV20.                         |
| AM218 | M343<br>(EXC10Ai)      | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.21 | NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.  | Although not strictly necessary, we are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.                                    |
| AM219 | M210<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.21 | NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.  | The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.                       |
| AM220 | M211                   | Strategy for  | NEW POINT Careful consideration of extent, scale  | Although not strictly necessary, we are happy to  |

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|       | (EXC10A)               | TTV Policy<br>Area – Policy<br>TTV29.21                 | and appearance of development to minimise local landscape impacts.  | include this new point which reflects what would in<br>any case have been required of a development<br>consistent with the other policies of the plan,<br>particularly DEV2, DEV20, DEV24 and DEV27.                         |
| AM221 | M212<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.22 | a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27. |
| AM222 | M213<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.23 | a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27. |
| AM223 | M214<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.24 | a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27. |
| AM224 | M215<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV29.25 | a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts. | Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27. |
| AM225 | M216<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area –<br>Strategic       | To enable the development of new homes, jobs and community infrastructure sufficient to meet the local needs of the sustainable villages identified in the area and the village networks  | The modification merely clarifies what is self-evident in the way the spatial strategy is designed to work, acknowledging that village support one another through village networks (e.g. see paras 3.10 and                 |

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|       |                        | Objective SO9  | they serve. This will be achieved through:  | 5.153)  |
| AM226 | M217<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area –<br>Strategic<br>Objective SO9 | NEW POINT Protecting and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.  | Although it is not strictly necessary we are happy to accommodate this additional wording sought by Historic England. |
| AM227 | M218<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.155                 | In the Sustainable Villages, the most appropriate way to balance these considerations will often be for local people to develop neighbourhood plans, responding to local needs and opportunities However, where there is no neighbourhood plan, development proposals could still come forward through the planning application process, and these would be assessed against the policies of the JLP. It should be noted that neighbourhood plans can also be brought forward for other parts of the Plan Area, but Policy TTV30 specifically relates to their role in meeting local needs in the Sustainable Villages. | The modification is considered to be helpful clarification, and does not change the context of the policy.            |
| AM228 | M219<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.156                 | It will be for neighbourhood plans themselves to determine which sites to bring forward for development, provided that they are consistent with the provisions of the JLP. However, for the purposes of plan monitoring only of identifying a potential housing supply figure for the Sustainable Villages, an indicative assessment have-has been made of the potential number of homes that are capable of coming   | The modification is considered to be helpful clarification, and does not change the context of the policy.            |

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|       |                        |  | forward through neighbourhood plans (the South Hams & West Devon Village Sustainability Assessment Framework', Feb 2017). This assessment is based upon factors such as the level of services and facilities available in each settlement   |   |
| AM229 | M220<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – para<br>5.157 | The indicative figures should be used to inform neighbourhood plan or development plan-led development throughout the TTV policy area. Commitments and completions within sustainable villages prior to the point of adoption are not considered to make a contribution to the indicative figures, as these have already been counted within the JLP housing supply figures. The figures should be interpreted locally, applying constraints and opportunities. Whilst the figure for each village should be considered as a minimum number of new homes to be delivered through neighbourhood plans, it is understood that some neighbourhood plans may deliver less than indicated, for example in areas of high landscape sensitivity. The LPAs will keep under review the number of new homes coming forward in the Sustainable Villages over the life of the JLP | The modification is considered to be helpful clarification, and does not change the context of the policy.    |
| AM230 | M221<br>(EXC10A)       | Strategy for TTV Policy                            | Villages able to accommodate around 20 dwellings each: Berry Pomeroy, Ermington,  | In respect of Ermington, the village was included in the list of Sustainable Villages set out in para 5.10 of |

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|       |                        | Area – Fig 5.8   | Halwell Rattery Villages able to accommodate around 10 dwellings each: Ashprington,, Bigbury, Rattery Wrangaton Grenofen, Sydenham Damerell  | the plan, but was accidentally omitted from Fig 5.8. It scores well in the South Hams and West Devon Village Sustainability Assessment Framework (O6) and could support a minimum of 20 new homes. The village was included in the Thriving Towns and Villages Settlement Topic Paper (TP2). In relation to the other modifications, we agree that these are justified by the evidence base; Rattery's position has been amended following further consideration with local community representatives. |
| AM231 | M222                   | Strategy for   | The countryside includes all land that falls outside   | The modification is considered to be helpful   |
|       | (EXC10A)               | TTV Policy<br>Area – new<br>para to follow<br>para 5.160               | the Main Towns, the Smaller Towns and Key Villages and the Sustainable Villages. The Thriving Towns and Villages SPD will identify specific settlement boundaries for these towns and villages in order to provide further guidance on the implementation of the policies in this section of the plan. These boundaries will be kept under review. | clarification, and does not change the context of the policy.  |
| AM232 | M223<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area –<br>Strategic<br>Objective<br>SO10 | Maintaining a naturally beautiful and thriving countryside: To protect, conserve preserve and enhance the natural beauty of South West Devon's countryside, and to avoid the creation of new homes development in unsustainable or inappropriate locations.  | The modification is considered to be helpful and consistent with the spatial strategy and development policies of the plan.  |
| AM233 | M224<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy                            | The LPAs will protect the special characteristics and role of the countryside. The following provisions will apply to the  | This minor change is to provide more precision in the policy.  |

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|       |                        | TTV31  | consideration of development proposals in the countryside:  |  |
| AM234 | M225<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV31                 | NEW SUB ELEMENT OF THE EXCEPTIONS TEST IN POINT 2 Or Protects and enhances the character of historic assets and their settings in the countryside.  | This modification is consistent with the positive strategy for the historic environment set out in the plan, particularly DEV21. |
| AM235 | M226<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV31                 | POINT 3 – HORSE RELATED DEVELOPMENT. THE PROPOSAL IS TO MOVE THIS TEXT UNCHANGED INTO A SEPARATE POLICY   | This modification seems a logical clarification.   |
| AM236 | M227<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – Policy<br>TTV31                 | 4 vi Help enhance the immediate setting or the site and include a management plan and exit strategy that demonstrates how long term degradation of the landscape and natural environment will be avoided. | The modification is considered to be helpful clarification, and does not change the context of the policy.                       |
| AM237 | M230<br>(EXC10A)       | Strategy for<br>TTV Policy<br>Area – new<br>para after para<br>5.166 | Further design guidance on the implementation of Policy TTV32 will be included in the Thriving Towns and Villages SPD.  | The modification is considered to be helpful clarification, and does not change the context of the paragraph.                    |
| AM238 | M231<br>(EXC10A)       | Development Policies – Strategic Objective SO11                      | To deliver development which is sustainable and of the right type for its location and of good quality, which:  | The modification is considered to be helpful clarification, and does not change the context of the objective.                    |
| AM239 | HM48<br>(EXD5vii)      | Development<br>Policies –<br>Policy DEV1                             | Policy DEV1 Protecting health and amenity Development proposals will be required to   | The modification is considered to be helpful clarification, and does not change the context of the policy.                       |

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|       |                        |  | safeguard the health and the amenity of local communities. In addition to measures set out in other policies of the plan, this will be through, as appropriate:  1. Ensuring that new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise disturbance for both new and existing homes residents, workers and visitors. Unacceptable impacts will be judged against the level of amenity generally in the locality.  2. Ensuring that developments and public spaces are designed to be accessible to all people, including people with disabilities or for whose mobility is impaired by other circumstances.  3. Requiring a Health Impact Assessment to be submitted as part of any Environmental Statement Impact Assessment submitted in relation to planning applications—for major development proposals with a likely significant health impact. Further standards and guidance in relation to this policy will be set out within an appropriate supplementary planning document. |   |
| AM240 | M234<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV3           | 1.Supporting the creation of new or enhancing existing sports facilities where a need has been identified, including bringing private and education related sports facilities into wider community use.   | The modification is considered to be helpful clarification about one potential supply source for sports facilities and does not change the context of the policy. |

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| AM241 | M235<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV4                    | Development that would result in the loss of playing pitches will only be permitted where the sporting benefits of the proposed development demonstrably outweigh the loss, and suitable replacement playing pitches to compensate for the loss are provided. This will normally be through direct replacement, although financial contributions to deliver the new playing pitch proposals, including the new hub sites, as identified in this plan may be acceptable where there is an implementation programme established and where delivery of the new site will take place alongside or close to the timing of the development proposal.   | Although this modification is not considered strictly necessary, this part of DEV4 could be seen as unnecessary duplication and over-elaboration of the provisions of DEV3, and Sports England have asked for its removal.                        |
| AM242 | HM49<br>(EXD5vii)      | Development<br>policies –<br>narrative after<br>Policy DEV4 | NEW PARA AFTER 6.15 The policy distinguishes between larger and smaller sites. This reflects the general principle that it is better to provide playing pitches closest to the point of need. However, the application of this principle will need to be determined on a case-by-case basis, having regard not only to the practicality and viability of delivering on-site provision, but also to the context of the development in relation to other sports infrastructure within the locality. For example, it is more appropriate to deliver sports facilities in hubs rather than as isolated facilities. For this reason, the policy does not identify a site size threshold to define 'larger sites', and instead | The modification doesn't change the policy but provides clarity about how the words 'larger' and 'smaller' used in the policy are to be interpreted. This would have otherwise been covered in SPD, where further guidance can still be provided. |

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|       |                        |  | leaves this to the planning application process.   |   |
| AM243 | HM50<br>(EXD5vii)      | Development<br>policies –<br>Policy DEV7           | 2. For developments of above ten homes, at least 30 per cent of the total number of dwellings should be affordable homes without public subsidy, subject to viability. These homes should be provided on-site, except in the case of sites of between 11 and 14 dwellings or where robustly justified. In such cases the requirement can be met by providing an off-site contribution provision or commuted payments in lieu of onsite provision to deliver affordable housing elsewhere in the policy area. | The reference to viability duplicates what is set out in DEL1. The provision about off-site contributions is clarified. |
| AM244 | M236<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV8           | 2 i All residential developments of 6 to 10 dwellings will provide an off-site commuted sum to deliver affordable housing to the equivalent of at least 30 per cent of the total number of dwellings in the scheme, subject to viability.  | The modification ensures complete internal consistency with the equivalent provision in Policy DEV7                     |
| AM245 | M237<br>(EXC10A)       | Development Policies – Policy DEV8                 | 2 ii All residential developments of 11 dwellings or more will provide at least 30 per cent affordable housing on site, subject to viability.  | The modification ensures complete internal consistency with the equivalent provision in Policy DEV7                     |
| AM246 | M238<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV8           | 3. Within the Main Towns, outside of areas with special designations, a minimum of at least 30 per cent on-site affordable housing will be sought for all schemes of 11 or more dwellings, subject to viability.   | The modification ensures complete internal consistency with the equivalent provision in Policy DEV7                     |
| AM247 | HM51<br>(EXD5vii)      | Development<br>policies –<br>Policy DEV9           | 4i Requiring at least 20 per cent of dwellings on all schemes of five or more dwellings (including conversions), where possible practicable, to meet   | Minor wording change to improve the clarity of the policy.  |

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|       |                        |  | national standards for accessibility and adaptability (Category M4(2) of Building Regulations).   |  |
| AM248 | HM52<br>(EXD5vii)      | Development<br>policies –<br>Policy DEV10          | 8. Houses in Multiple Occupation will only be permitted where the proposal: i. Provides adequate communal space for future residents including sufficient space to accommodate cooking, dining, bathroom and toilet facilities iii. Will be adequately managed in perpetuity including external maintenance and upkeep of the building and curtilage. | Minor wording changes to improve the clarity of the policy.  |
| AM249 | M239<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV13          | 4. The site must be large enough to provide for adequate on-site facilities for parking, storage, play, sewage and waste management, and residential amenity.   | The additional elements of this point are consistent with what would be required to meet other policies of the plan, especially DEV33 and DEV37 but it is helpful clarification to include them specifically here. |
| AM250 | M240<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV13          | 6. New sites in areas at high risk of flooding, including especially functional floodplains, will not be permitted given the particular vulnerability of caravans.  | The modification is considered to be helpful clarification.  |
| AM251 | M241<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV15          | 1. Appropriate and proportionate expansion of existing employment sites in order to enable retention and growth of local employers will be supported, subject to an assessment that demonstrates no residual impacts on neighbouring uses and the environment.  | The modification adds clarity to evidence that will be needed in the context of wider policies to safeguard the environment.   |

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| AM252 | M242<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV15          | Business start-ups, home working, small scale employment and the development and expansion of small business in residential and rural areas will generally be supported, subject to an assessment of their impact that demonstrates no residual adverse impacts on neighbouring uses and the environment.   | The modification is considered to be helpful clarification, and does not change the context of the policy.   |
| AM253 | M243<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV15          | The loss of tourist or leisure development will only be permitted where there is no proven demand for the facility. Camping, caravan, or-chalet or similar facilities that respond to an identified local need will be supported, provided the proposal is compatible with the rural road network, has no adverse environmental impact and is not located within the Undeveloped Coast policy area. | The modification is considered to be helpful clarification, and does not change the context of the policy.   |
| AM254 | HM14<br>(EXD5ii)       | Development<br>Policies –<br>Policy DEV16          | 2. Proposals for main town centre uses in edge of centre locations, and out of centre locations and the Derriford Commercial Centre should be supported by a sequential test that   | This was clearly the intent of Policy PLY38.1 where it said 'All proposals which form part of the development of the commercial centre or future changes to it which include retail floorspace will be determined and controlled in accordance with the application of the sequential and impact tests.' This is therefore a correction to ensure consistency in the plan. |
| AM255 | HM15<br>(EXD5ii)       | Development<br>Policies –<br>Policy DEV16          | 3. Proposals for retail, leisure and office development in edge of centre locations, and out of centre locations and the Derriford Commercial Centre must be accompanied by an impact assessment where  | This was clearly the intent of Policy PLY38.1 where it said 'All proposals which form part of the development of the commercial centre or future changes to it which include retail floorspace will be determined and controlled in accordance with the application of the sequential and impact tests.' This is therefore a   |

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| AM256      | HM16                   | Development  | The Supplementary Planning Documents for the  | correction to ensure consistency in the plan.  The modification is merely to acknowledge a need for   |
| , <u>.</u> | (EXD5ii)               | Policies –<br>Policy para<br>6.73 (DEV19)          | Plymouth and Thriving Towns and Villages Policy Areas will provide guidance on the implementation of this policy, including in cases where the delivery of a local employment growth scheme is not practical or feasible.   | some flexibility in implementation of the policy in that there could be circumstances where provisions in the policy might not able to be achieved. We do not consider the change a soundness matter but a point of clarification in response to a discussion at the hearing. |
| AM257      | HM54<br>(EXD5vii)      | Development<br>Policies –<br>Policy DEV20          | 1. Creating a positive legacy of decisions ensuring that the lifetime of buildings, the quality of design, the resilience of the materials and opportunities to achieve a sustainable resource efficient design have been considered. Using materials and design solutions that are resilient to their context and will endure over time. Larger scale development should seek to address Building for Life criteria or a similar design framework. | The modification is considered to be helpful clarification, and does not change the context of the policy, and also addresses inspectors' concern that provision reads more as an objective.  |
| AM258      | M245<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV20          | 2. Having proper regard to the pattern of local development and the wider development context and surroundings in terms of style, local distinctiveness, siting, layout, orientation, visual impact, views, scale, massing, height, density, materials, detailing, historic value, landscaping and character, and the demands for movement to and from nearby locations.  | The modification is considered to be helpful clarification, and does not change the context of the policy.  |
| AM259      | M246<br>(EXC10A)       | Development Policies – Policy DEV20                | 4. Delivering building design that is distinctive to the place where it is located locally distinctive design.  | The modification is considered to be helpful clarification, and does not change the context of the policy.  |

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| AM260 | Statement of Common Ground with Historic England (SCG4) | Development<br>Policies –<br>Policy DEV21          | Conserving Strategic approach to the historic environment  The LPAs will pursue a proactive and solution-orientated approach for the conservation of the historic environment, ensuring that it is promoted as a key element of local character and distinctiveness, forms a strategic context for regeneration and development, and is conserved as part of the area's cultural offer which include:by:  1. Protecting and enhancing the character and special interest of heritage and their setting, including:  i. Scheduled monuments (or an archaeological site of national importance), listed buildings, registered parks and gardens, conservation areas, the World Heritage Site and archaeological remains (including protected wreck sites marine archaeology).  ii. Non-designated heritage assets, including areas of archaeological interest, unregistered parks and gardens and landscapes positively identified as having significance in terms of the historic environment.  2. Supporting In particular they will support proposals for heritage-led regeneration and working with developers and investors to | The modification removes unnecessary repletion with DEV22 and includes moving the policy to the Spatial Strategy section of the plan in recognition of its strategic nature. |

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|       |                        |  | encourage them to see historic and culturally led regeneration as the first choice method to achieve a quality legacy. In this respect, development should make a positive contribution to local character and the enhancement of local distinctiveness.  |  |
| AM261 | M262<br>(EXC10A)       | Development<br>Policies – para.<br>6.85            | Parts of West Devon are designated within the Cornwall and West Devon Mining Landscape World Heritage Site which was inscribed in 2006. The conservation and enhancement of the Outstanding Universal Value (OUV) of the World Heritage Site is of strategic importance, and the preparation of the adopted Management Plan for the World Heritage Site will help to sets out how the protection and enhancement of this important cultural landscape should be undertaken. The influence of mining is clear to see in the historic buildings, structures, listed buildings and scheduled monuments within the Stannary town of Tavistock and parts of the town are included within the Area 10: Tamar Valley Mining District with Tavistock of the World Heritage Site | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM262 | M263<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV24          | 2. Conserve and enhance the characteristics and views of the area along with valued attributes and existing site features such as trees, and hedgerows and watercourses that contribute to the character and quality of the area.   | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM263 | M264                   | Development  | 6. Where necessary, be supported by Landscape   | The modification is considered to be helpful   |

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|       | (EXC10A)               | Policies –<br>Policy DEV24                                       | and Visual Impact Assessments and landscaping schemes that enhance that proposed development.   | clarification, and does not change the context of the policy.  |
| AM264 | M265<br>(EXC10A)       | Development<br>Policies – para.<br>6.90                          | The Plan Area contains a wide range of landscapes, townscapes and seascapes including three areas that are nationally protected nationally landscapes. The LPAs are committed to ensuring that proper consideration of impacts on landscape character and visual amenity is made through the planning process and that development will contribute to this area's valued character and identity.  | The modification is considered to be helpful clarification, and does not change the context of the policy.   |
| AM265 | M266<br>(EXC10A)       | Development Policies – Policy DEV25                              | 4. Is consistent with policy statements for the local policy unit in the current Shoreline Management Plan 2.   | This is a helpful suggestion to future proof the policy and does not change the context of the policy.   |
| AM266 | M267<br>(EXC10A)       | Development Policies – Policy DEV25                              | NEW POINT Is consistent with the relevant<br>Heritage Coast objectives, as contained within the<br>relevant AONB Management Plan.   | Although this modification is not strictly necessary, we are happy to support the inclusion of this new point as it reflects what is already intended. |
| AM267 | M268<br>(EXC10A)       | Development Policies –para. 6.91 (which will split into 2 paras) | Some of the country's most spectacular undeveloped coastlines if are found in the Plan area Undeveloped Coasts have been designated for the Plan area to conserve their undeveloped character. Heritage Coasts are defined by Natural England to conserve, protect and enhance the natural beauty, heritage, and flora and fauna of the Heritage Coasts; to facilitate and enhance their enjoyment, understanding and appreciation by the public; to maintain and | The modification is considered to be helpful clarification, and does not change the context of the policy.   |

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| AM268   | M269                   | Development  | improve the environmental health of their inshore waters and beaches; and to take account of the needs of agriculture, forestry and fishing, and of the economic and social needs of small communities on these coasts. This policy seeks to protect this region's valuable undeveloped coast and defined Heritage Coast, ensuring that only development that contributes positively to its character is permitted. The South Devon AONB Management Plan incorporates the objectives and targets for the South Devon Heritage Coast.  The highest degree of protection will be given to | The modification is considered to be helpful   |
| AIVIZUO | (EXC10A)               | Policies – Policy DEV27                            | the protected landscapes of the South Devon AONB, Tamar Valley AONB and Dartmoor National Park. The LPAs will protect the AONBs and National Park, including their setting, and the setting of Dartmoor National Park from potentially damaging or inappropriate development located either within the protected landscapes or their settings. In considering development proposals the LPAs will:  | clarification, and does not change the context of the policy.  |
| AM269   | M270<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV27          | 1. Refuse permission for major developments in within or detrimentally affecting the setting of the a protected landscapes, except in exceptional circumstances and where it can be demonstrated that they are in the public interest.  | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM270   | M271<br>(EXC10A)       | Development<br>Policies –                          | 6. Seek opportunities to enhance and restore protected landscapes by addressing areas of  | The modification is considered to be helpful clarification, and does not change the context of the         |

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|       |                        | Policy DEV27   | visually poor quality or inconsistent with character, securing through the development visual and other enhancements to restore local distinctiveness, guided by the protected landscape's special qualities and distinctive characteristics or valued attributes.  | policy.  |
| AM271 | M272<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV27                  | 8. Require development proposals located within or within the setting of the AONB a protected landscape to:   | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM272 | M273<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV27                  | 8 i Conserve and enhance the natural beauty of<br>the area protected landscape with particular<br>reference to their special qualities and distinctive<br>characteristics or valued attributes.   | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM273 | M274<br>(EXC10A)       | Development Policies – Policy DEV27                        | 8 vii Retain links, where appropriate, with the distinctive historic and cultural heritage features of the area protected landscape.  | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM274 | M275<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV28                  | Development should support the protection, conservation, enhancement and restoration of biodiversity and geodiversity interests across the Plan Area. Specific provisions are identified below:   | This minor change is to more precisely reflect NPPF wording.   |
| AM275 | M283<br>(EXC10A)       | Development<br>Policies – new<br>para. after<br>para. 6.97 | Inter-tidal habitats are priority habitats and an important part of the biodiversity network in the Plan Area. Tidal encroachment should be avoided and potential impacts upon estuarine ecology must be fully assessed, taking account of predicted sea level rise (coastal squeeze) and any in-combination effects. | The text provides potentially helpful information which we are happy to include.                           |
| AM276 | M284                   | Development  | 1. Development that would result in an  | Correction of an error, as the plan recognises that  |

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|       | (EXC10A)               | Policies –<br>Policy DEV29                         | unacceptable conflict with the function(s) or characteristic of Strategic Green Spaces and Local Green Spaces (Plymouth Policy Area) will be resisted. In these areas development will normally only be permitted where it enhances the value of the green space, for example through sports, allotment and play provision, lighting, cafes, educational uses and sustainable transport routes. | LGSs can also be promoted through neighbourhood plans.  |
| AM277 | M285<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV29          | 4. Where development is proposed in an area where there are Local deficiencies in the accessibility and quality of green space and play space should be addressed in development, in line with local standards, appropriate mitigation should be provided to ensure that the development meets the requirements of sustainable development.   | The modification is considered to be helpful clarification, and does not change the context of the policy.  |
| AM278 | M286<br>(EXC10A)       | Development Policies – new para after para 6.100   | Green infrastructure also provides significant benefits in terms of flood risk and water quality management as well as aiding adaptation to climate change.   | The text provides information about a water management function of green space which we are happy to include.   |
| AM279 | M288<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV31          | Development will be required to contribute positively to the achievement of a high quality, effective and safe transport system in the Plan Area. It will which promotes sustainable transport choices and facilitates sustainable growth that respects the natural and historic environment. Development proposals should therefore, where appropriate:  | Although it is not strictly necessary we are happy to accommodate these wording changes as requested by Historic England (given that policies protecting the historic and natural environment are elsewhere in the plan). |

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| AM280 | M289<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV31          | 6. Mitigate the environmental impacts of transport, including impacts on air quality, and noise pollution, landscape character and the quality and distinctiveness of urban and rural environments.   | Although it is not strictly necessary we are happy to accommodate these wording changes (given that policies protecting the historic and natural environment are elsewhere in the plan) as requested |
| AM281 | M290<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV33          | 3. All planning applications for major development in the Plymouth administrative area will be required to include a site waste management plan demonstrating how the demolition, construction and operational phases of the development will minimise the generation of waste. The provisions of Policy W4 of the Devon Waste Plan will apply to the South Hams and West Devon administrative areas.                       | The modification is considered to be helpful clarification, and does not change the context of the policy.   |
| AM282 | M292<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV33          | 5 ii The proposals are compatible with the objective of moving the management of waste up the waste hierarchy. Landfill of waste arisings within Plymouth will not be supported in Plymouth.  | The modification is considered to be helpful clarification, and does not change the context of the policy.   |
| AM283 | M293<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV34          | The need to deliver a low carbon future for Plymouth and South West Devon should be considered in the design and implementation of all developments, in support of a Plan Area target to halve 2005 levels of carbon emissions by 2034 UK's legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels (Climate Change Act 2008) and to increase the use and production of | The modifications apply a local target which is considered more appropriate for the plan and improve consistency with the NPPF.  |

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|       |                        |  | decentralised energy. The following provisions apply:   |  |
| AM284 | M294<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV34          | 4. Developments should reduce the energy load of the development by good layout, orientation and design to maximise natural heating, cooling and lighting, and reduce the heat loss area. For major developments, a solar master plan should show how solar gain access to natural light has been optimised in the development, aiming to achieve a minimum daylight standard of 27 per cent Vertical Sky Component and 10 per cent Winter Probable Sunlight Hours. | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM285 | HM57<br>(EXD5vii)      | Development<br>policies –<br>Policy DEV34          | 6. Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to a future planned that network. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.  | Tidying up of wording to make policy clearer.  |
| AM286 | M295<br>(EXC10A)       | Development<br>Policies – para<br>6.122            | The UK continues to move towards the legally binding commitment of reducing our national carbon emissions by 80% from the 1990 baseline (Climate Change Act 2008). In order to ensure national governments are progressing as effectively as possible towards this target, interim targets have been periodically agreed, the most recent of these being the 5th Carbon Budget, adopted by Parliament in 2016. The LPAs will play                                   | The modification is a consequential change of the proposed modification to DEV34                           |

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|       |                        |  | an important role through seeking developments that are well designed and which support the delivery of renewable and low carbon energy. The policy identifies a carbon reduction target for the Plan Area in support of this outcome.   |   |
| AM287 | M296<br>(EXC10A)       | Development<br>Policies – para<br>6.126            | To mitigate the effects of growth on climate change and increase the level of decentralised energy, major developments should deliver a proportional contribution to on-site or off-site renewable / low carbon energy generation capacity. Where appropriate, this will include heat networks using low carbon or renewable heat sources. Recognising that fabric efficiency measures are most efficient We have used carbon as a convenient metric by which we quantify the amount of renewable energy generation or and energy efficiency savings, as calculating energy demand can be complex. | The modification is a consequential change of the proposed modification to DEV34  |
| AM288 | HM58<br>(EXD5vii)      | Development<br>Policies –<br>Policy DEV35          | 2. The proposal has been robustly assessed and shown to be acceptable, both individually and cumulatively, in terms of its likely impact on landscape sensitivity and capacity, and on the natural environment and heritage assets. It should also be and it is demonstrated that it the proposal does not compromise the purposes of internationally or nationally important nationally designated landscapes., environmental or heritage assets.   | The modification is considered to be helpful clarification, and does not change the context of the policy, and is consistent with DEV21, DEV22 and DEV24. |

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| AM289 | M298<br>(EXC10A)       | Development Policies – Policy DEV35                | 4. Any farm land that is used is retained in some form of agricultural or biodiversity use, proportionate to the scale of the proposal.  | The modification is considered to be helpful clarification, and does not change the context of the policy.   |
| AM290 | M299<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV35          | 5. There has been early consultation with the local communities affected by the development, the planning application demonstrates how the proposal has been informed by the outcome of the consultation, and the development contains proposals for shared ownership between the developer/operator and the community or justification as to why this is not appropriate. | The modification is considered to be helpful clarification, and does not change the context of the policy.   |
| AM291 | M300<br>(EXC10A)       | Development Policies – Policy DEV35                | Where the development is to meet a business need, the proposed generation is proportionate to the business use and the energy is used on site.   | We agree that this is an unnecessary restriction that can be removed. The modification does not change the context of the policy.                          |
| AM292 | M301<br>(EXC10A)       | Development Policies – Policy DEV37                | 3. Development proposals at sites which fall into Flood Zones 2 or 3 (in whole or in part) should as a minimum:  | Although it is not strictly necessary we are happy to accommodate this wording change as requested by the Environment Agency.                              |
| AM293 | HM59<br>(EXD5vii)      | Development Policies – Policy DEV37                | NEW SUB POINT UNDER POINT 3 Promote the safety of people in consultation with emergency planning services.   | Although it is not strictly necessary we are happy to accommodate this provision as requested by the Environment Agency.                                   |
| AM294 | M303<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV37          | 4. Development should incorporate sustainable water management measures Surface water from proposed developments should be discharged in a separate surface water drainage system which should be discharged according to the following drainage hierarchies set out in the Plymouth and Devon Local Flood Risk Management Strategies.                                     | The modification is considered to be a helpful clarification and simplification of the policy. The modification does not change the context of the policy. |

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|       |                        |  | <ul> <li>i. Discharge to a waterbody (if available and with sufficient capacity).</li> <li>ii. Infiltration.</li> <li>iii. Discharge to a waterbody (if available and with sufficient capacity).</li> <li>iv. Discharge to a surface water sewer, highway drain or culverted watercourse with attenuation as required.</li> <li>v. In exceptional circumstances, discharge to a combined sewer.</li> </ul>   |  |
| AM295 | M304<br>(EXC10A)       | Development<br>Policies –<br>Policy DEV37          | 8. Development will not be permitted without confirmation that sewage / wastewater treatment facilities can accommodate or will be improved to accommodate the new development, in advance of the development taking place.  | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM296 | M305<br>(EXC10A)       | Development<br>Policies – para<br>6.137            | The policy supports national requirements for all major development to incorporate sustainable urban drainage systems (SUDS) and will also help by requiring design and drainage solutions which should lead to a reduction in the amount of rainwater reaching the sewers and water courses. and improvements to the capacity of particular water courses and sewers. In particular, new and renewed connections to the combined sewer must be avoided. Discharges of surface water flows to the combined sewer can increase the risk of pollution of the water environment through releases from combined sewer overflows which in | The modification is considered to be helpful clarification, and does not change the context of the policy. |

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|       |                        |   | turn can have impacts on the water quality,<br>especially bathing waters. Development should<br>incorporate water efficient design principles,  |   |
| AM297 | M306<br>(EXC10A)       | Development<br>Policies – new<br>para after para<br>6.137 | Plymouth City Council's Local Flood Risk Management Strategy sets out a drainage hierarchy which differs from the Devon County Council in that discharge of surface water to a waterbody is identified ahead of infiltration, both hierarchies are set out in the relevant Local Flood Risk Management Strategies. A number of factors have led to a different approach in Plymouth including the strategic location of waterbodies within Plymouth Surface Water drainage catchments, the presence of contaminated land, the dense urban nature of Plymouth and development sites restricting soakaway location, an underlying geology that varies locally combined with steep topography which can increase the risk of groundwater re-emergence. This approach is better able to support rain water harvesting by allowing surface water to be intercepted prior to discharge, which in turn had ecological and amenity benefits and also proves | The modifications are considered to be helpful clarifications consequential to the proposed modifications of DEV37. |
| AM298 | M307<br>(EXC10A)       | Development Policies – new para after para 6.138          | easier to adopt and maintain in an urban area.  A number of different bodies have responsibility for managing flood risks. DEFRA has overall national responsibility for policy on flood and coastal erosion risk management. The   | The text provides potentially helpful information which we are happy to include.                                    |

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|       |                        |  | Environment Agency is responsible for taking a strategic overview of the management of all sources of flooding and coastal erosion, for example setting the direction for managing risks through strategic plans, providing evidence and advice to inform policies and preparing National Flood and Coastal Risk Management Strategies.  Lead Local Flood Authorities are responsible for developing and maintaining a strategy for local flood risk management in their areas and maintaining a register of flood risk assets. The Water and Sewerage Companies, such as South West Water, are responsible for providing and managing highway drainage and roadside ditches, and must ensure that road projects do not increase flood risk. |  |
| AM299 | M308<br>(EXC10A)       | Development Policies – Policy DEV38                | 5. If it is a replacement proposal, the gross volume of the replacement dwelling building or structure is no larger than the one it is to replace.   | The modification is considered to be helpful clarification, and does not change the context of the policy. |
| AM300 | M309<br>(EXC10A)       | Delivery and<br>Monitoring –<br>para 7.21          | Policy DEL1 sets out the policy approach that the LPAs will take in considering planning applications and in planning negotiations. This will be amplified into specific guidance in the two SPD documents, which will also include detailed provisions relating to how development must meet its statutory obligations to avoiding adverse impact on the integrity of European sites.   | Although it is not strictly necessary we are happy to accommodate this wording change as requested.        |
| AM301 | HM60                   | Delivery and                                       | 5. Requiring robust viability evidence to be   | Although not strictly necessary, this modification was   |

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|       | (EXD5vii)              | monitoring –<br>Policy DEL1   | submitted where a developer contends that planning obligations sought, including for affordable housing, would make a proposal economically unviable. The LPAs will seek an open book approach in these cases                                   | suggested by the inspectors during the discussion on whether or not DEV7 and DEV8 should say 'subject to viability'. It is for the purposes of clarification in that context, and not an issue of soundness. |
| AM302 | HM18<br>(EXD5iii)      | Annex 1 –<br>Plymouth<br>Policy Area                                  | NEW ITEM Improvements to the A38 trunk road and its main junctions (including the Weston Mill junction and widening of the A38 between Weston Mill junction and Forder Valley junction).  | The measures are already identified in SPT8.4i and PLY61.1 although the modification adds a bit more detail.   |
| AM303 | HM19<br>(EXD5iii)      | Annex 1 – TTV<br>Policy Area –<br>Main Towns                          | NEW ITEM Tongue End Cross – Junction of A30 and B3260 minor scheme  | The measures set out a particular improvement scheme that Highways England would seek as part of meeting the requirements of TTV19.2.  |
| AM304 | HM17<br>(EXD5ii)       | Annex 2   | I6 – Housing and employment floorspace delivered and total jobs.  | The modification merely confirms that it is also the intention to monitor total jobs across plan area.   |
| AM305 | M310<br>(EXC10A)       | Annex 2 – Plan<br>Targets and<br>Direction of<br>Travel<br>Indicators | I14 Water body classification and bathing water quality.  | We are happy to amended I14 to accommodate this request.   |
| AM306 | M311<br>(EXC10A)       | Annex 2 – spatial strategy measures of success                        | See AM29  | Although it is not strictly necessary we are happy to accommodate this wording change  |
| AM307 | M312<br>(EXC10A)       | Glossary  | Biosphere Reserve - A designation by the United Nations Educational, Scientific and Cultural Organisation (UNESCO) which identifies an area of world Biosphere Reserve class natural value that demonstrates the best example of people working | Although not strictly necessary, we are happy to include this new item.  |

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|       |                        |  | in harmony with nature for the benefit of all.   |   |
| AM308 | M313<br>(EXC10A)       | Glossary   | Green Infrastructure: Green infrastructure is a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, rivers, marine sites and other water bodies and features such as green roofs and walls. In practice this is inter-changeable with Natural Infrastructure. | This is a helpful addition.   |
| AM309 | M314<br>(EXC10A)       | Glossary   | Natural Infrastructure: For a definition see 'Green Infrastructure'. Natural Infrastructure is used more often due to the need to consider Plymouth's blue aquatic and marine environment which often gets forgotten through the use of 'green'.   | This is a helpful addition.   |
| AM310 | M315<br>(EXC10A)       | Glossary   | Office of Rail Regulation Road (ORR) -The independent safety and economic regulator for Britain's railways. Provides regulation on safety and performance of the rail industry across the UK and monitors Highways England.  | Updated description.  |
| AM311 | M316<br>(EXC10A)       | Glossary   | Priority Habitats – Those identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)   | This is a helpful addition, although it is noted that modifications have also been sought to refer in policies to the BAP rather than priority habitats. However, inclusion of this item in the Glossary helps make it clear that they refer to one and the same thing. |

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| AM312 | M319<br>(EXC10A)       | Policies Map –<br>Plymouth<br>Policy Area                                       | Coastal Change Management Area has been put<br>on the Policies Map for South Hams but has been<br>missed from the Policies Map for the Plymouth<br>Policy Area | Correction of an error which was identified after submission.                |
| AM313 | M348<br>(EXC10Ai)      | Policies Map  | Addition of centre boundary for City Centre  | Correcting an erroneous omission.  |
| AM314 | M349<br>(EXC10Ai)      | Policies Map  | Addition of centre boundaries / Primary Shopping<br>Area boundaries for Village centres of the smaller<br>town and larger villages                             | Correcting a gap as identified by the inspectors/                            |
| AM315 | HM30<br>(EXD5v)        | Policies Map  | Ivybridge town centre boundary to be aligned to neighbourhood plan boundary  | As discussed at the hearings. to ensure full alignment between the two plans |
| AM316 | M318<br>(EXC10A)       | Policies Map –<br>Plymouth<br>Policy Area<br>Map 3 –<br>Plymouth<br>Green Space | Reduction of boundary of local green space allocation at Petersfield Close/Efford Crematorium  | Correction of error which we had intended to correct before Submission       |
| AM317 | M317<br>(EXC10A)       | Map 1   | Removal of all proposed Marine Conservation<br>Zones as they have no status. These are Erme<br>Estuary, Devon Avon Estuary and Dart Estuary.                   | This is a correction to the Map.   |