Schedule of and summary response to representations on Additional and Policy Map Modifications

March 2019
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<tr>
<th>Comment ID</th>
<th>Consultee ID</th>
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<th>Full Name (Agent)</th>
<th>Organisation (Agent)</th>
<th>Full Name (Consultee)</th>
<th>Organisation (Consultee)</th>
<th>Original Comment</th>
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<tbody>
<tr>
<td>1</td>
<td>1186559</td>
<td></td>
<td>All of them.</td>
<td></td>
<td>Mr Robert Rush</td>
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<td>Restricting these comments to the narrow legal matter is &quot;bureaucratic management of common sense in order to achieve a certain acceptance in principle&quot; and unreasonable control of fair comment. There has always been a groundswell of opinion that doesn't see the need for such massive and rapid urbanisation of our country's agricultural land. This has now been justified by the newest investigation and research by a £20k independent report commissioned by CPRE. At least make sure you read it please? We have learnt locally from various Govt. quangos in recent years that &quot;consultation&quot; is a hollow word that doesn't really change things for the better, and is just a way of getting the spurious doctrines accepted and in place. The report cited above proves the level of proposed development is around twice that needed and is unsustainable without major investment in infrastructure, (which on past performance is sadly not going to happen). The Government figure of a need for 300,000 new dwellings per year is greatly overstated and the CPRE report says it must be reduced to 150,000 per year (immediately - by a review of your conclusions please?) This is roughly the level of housing that has been carried out over the last 60 years historically and is sustainable.</td>
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<td>76</td>
<td>1095125</td>
<td>AM01</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td></td>
<td></td>
<td>SUPPORT.</td>
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<tr>
<td>77</td>
<td>1095125</td>
<td>AM02</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
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<td>SUPPORT. AM2 additions clarify the ambiguity raised in my previous representation on the Pre-Submission version.</td>
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<tr>
<td>78</td>
<td>1095125</td>
<td>AM03</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT with minor reservations. AM3 partially addresses the matter raised in my representation on the Pre-Submission version, that the objective should be to avoid development of any kind in unsustainable or inappropriate locations not just the provision of homes. In line with the approach taken in SO1 which seeks to minimise development in sensitive areas, rather than merely homes. My minor reservation is that the Council's have chosen not to add 'unsustainable or inappropriate locations'. So the question is whether 'unsustainable locations' and 'inappropriate locations' are equivalent in all circumstances.</td>
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<td>79</td>
<td>1095125</td>
<td>AM04</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT. AM4 fully addresses the matters raised.</td>
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<td>80</td>
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<td>AM05</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT. AM5 fully addresses the issues raised.</td>
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<td>81</td>
<td>1095125</td>
<td>AM06</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT. AM6 fully addresses the issue raised</td>
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<td>82</td>
<td>1095125</td>
<td>AM10</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT with reservations. New paragraph is supported in principle, however, the legal duty of the local planning authorities is to 'conserve and enhance natural beauty'. The NPPF's conserve and enhance landscape and scenic beauty, refers to what is to be given 'great weight'. But it is the duty which must be considered in the undertaking of local planning authority functions under this Local Plan. Therefore this paragraph must refer to conserving enhancing natural beauty.</td>
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<td>94</td>
<td>1095125</td>
<td>AM100</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td></td>
<td></td>
<td>SUPPORT inclusion of a lighting strategy to minimise light pollution.</td>
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<tr>
<td>95</td>
<td>1095125</td>
<td>AM101</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT</td>
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<td>96</td>
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<td>AM102</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<tr>
<td>53</td>
<td>653611</td>
<td>AM103</td>
<td>Marcus Salmon Environment Agency</td>
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<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following: Additional Modifications: AM103 Inclusion of the new point in TT15.2 requiring development to not exacerbate water quality issues in the Salcombe to Kingsbridge SSSI. This was not one of our recommendations but we are strongly supportive of the addition.</td>
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<tr>
<td>97</td>
<td>1095125</td>
<td>AM103</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>98</td>
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<td>Ms Victoria Tanner-Tremaine</td>
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<td>99</td>
<td>1095125</td>
<td>AM109</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT</td>
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<td>14</td>
<td>1187545</td>
<td>AM11</td>
<td>Mrs Emma James Okehampton Town Council</td>
<td>The Council suggests the following amendment with reference to Okehampton and its hinterland; Immediate reintroduction of the rail link between the town and Exeter, which already exists. For this to be effective there needs to be infrastructure improvements along the line, in particular the construction of a Parkway Station to the East of the town. We also place importance on the continued use of Okehampton town station for the leisure and tourism markets and residents to the West of the town. For these strategies to be effective there needs to be adequate parking at both stations.</td>
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<td>54</td>
<td>658611</td>
<td>AM113</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM113 Addition of text to TTV27 requiring investigation and remediation of contamination as previously agreed.</td>
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<td>55</td>
<td>658611</td>
<td>AM115</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM115 Additions to policy TTV28.5 (the former Dairy Crest site) regarding works to reduce flood risks, investigate and remediate contaminated land, and habitat enhancements.</td>
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<td>100</td>
<td>1095125</td>
<td>AM117</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT</td>
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<td>16</td>
<td>1187545</td>
<td>AM12</td>
<td>Mrs Emma James Okehampton Town Council</td>
<td>We welcome the recognition of the increase in rail travel. The pending reopening of the Okehampton rail service will see new passenger growth of a similar proportion as passengers use Okehampton as a new multi-modal hub station for its residents, Tavistock and the whole of West Devon. This future development would be consistent with GWR's station investment plans for the South West Peninsula (GWR Customer Panel, November 2018)</td>
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<tr>
<td>56</td>
<td>658611</td>
<td>AM128</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM128 Inclusion of the new point in TTV29.19 requiring development to not exacerbate water quality issues in the Salcombe to Kingsbridge SSSI. This was not one of our recommendations but we are strongly supportive of the addition.</td>
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<td>57</td>
<td>658611</td>
<td>AM131</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM131 Inclusion of the new point in TTV29.21 requiring development to not exacerbate water quality issues in the Salcombe to Kingsbridge SSSI. This was not one of our recommendations but we are strongly supportive of the addition.</td>
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<td>8</td>
<td>1002307</td>
<td>AM136</td>
<td>Mr Steve Male Highampton Neighbourhood Planning Group</td>
<td>1 The problem is that it cuts across the concept of Neighbourhood Planning as each NP Group has a specified remit in terms of constructing a &quot;local&quot; plan. Whereas this provision to consider the needs of other villages can’t be done by NP Groups. 2. Neighbourhood Plan Groups are specifically set up to ensure Development Plans meet local needs they do not have the remit or the resources to consider wider area concerns. Nor are they legitimate representatives of those wider areas so any plan produced on this basis would be questionable as representing the needs of the wider area. 3 Indeed the WDBC designation letter of Highampton Neighbourhood Planning Group explicitly states that the Highampton Parish boundary is the limit of our approved authority. 4 Under this additional modification who will decide which village in a wider network should be a focus of development when different villages have differing objectives? 5 Moreover, there was no definition of the &quot;needs of the sustainable villages and the village networks they serve&quot;. It was very woolly and likely to bring the neighbourhood planning process into disrepute. Due to the conflict of this provision with the JLP centrality of Neighbourhood Plans for Sustainable Village development plans then this additional modification should be scrapped. The alternative for WDBC to provide the funds for NP Groups to: seek members from all the wider village networks, survey and perform Housing needs assessments on all their surrounding villages is not feasible.</td>
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<td>58</td>
<td>658611</td>
<td>AM146</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM146 Changes to DEV13, in accordance with our SoCG, requiring adequate facilities for sewage and waste at travellers’ sites, as well as clarification to highlight that such sites in functional floodplain will not be permitted.</td>
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<tr>
<td>59</td>
<td>658611</td>
<td>AM147</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM147 Changes to DEV13, in accordance with our SoCG, requiring adequate facilities for sewage and waste at travellers’ sites, as well as clarification to highlight that such sites in functional floodplain will not be permitted.</td>
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<tr>
<td>60</td>
<td>658611</td>
<td>AM153</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM153 Addition of ‘watercourses’ to habitats listed in policy DEV24.</td>
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<td>101</td>
<td>1095125</td>
<td>AM153</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td>SUPPORT all proposed modifications under both these AMs</td>
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<tr>
<td>102</td>
<td>1095125</td>
<td>AM154</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td>SUPPORT all proposed modifications under both these AMs</td>
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<tr>
<td>103</td>
<td>1095125</td>
<td>AM155</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td>SUPPORT all proposed modifications.</td>
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<tr>
<td>104</td>
<td>1095125</td>
<td>AM156</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT. AM156 fully addresses my representation comments</td>
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<tr>
<td>105</td>
<td>1095125</td>
<td>AM157</td>
<td>Ms Victoria Tanner-Tremaine</td>
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<td>SUPPORT. AM157 fully addresses my representation comments</td>
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<tr>
<td>106</td>
<td>1095125</td>
<td>AM158</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td>SUPPORT. AM158 addresses my representation comments</td>
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<tr>
<td>107</td>
<td>1095125</td>
<td>AM159</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td>SUPPORT. AM159 fully addresses issues raised on this part of the policy. It now addresses the requirements for development affecting the AONBs and Dartmoor National Park (DNP). It is now clear that although DNP lies outside the Plan Area land in DNP is to be protected (by this policy) from effects arising in the Plan Area. Proposed modifications do not address requirements for development to &quot; Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests. Those in the AONBs should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1. Areas in the setting of protected landscapes should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1.&quot; Added to the policy. I feel this is reasonable given that other development policies, such as DEV34, also contain more detailed requirements.</td>
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<td>113</td>
<td>1095125</td>
<td>AM159</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td>Proposed modifications do not address requirements for development to &quot; Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests. Those in the AONBs should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1. Areas in the setting of protected landscapes should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1.&quot; Added to the policy. I feel this is reasonable given that other development policies, such as DEV34, also contain more detailed requirements.</td>
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<td>13</td>
<td>1187545</td>
<td>AM16</td>
<td>Mrs Emma James Okehampton Town Council</td>
<td></td>
<td>Okehampton Town Council supports the modifications to the policy and would like to make further recommendations to address transport issues throughout West Devon. In particular the Council feels the extension of the rail link between Okehampton and Bere Alston would be an appropriate sustainable solution to the current environment problems continually identified by the encroachment of the sea on the Dawlish line. This is intended to be a complementary service rather than a replacement of the existing main line to Plymouth and Cornwall.</td>
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<td>108</td>
<td>1095125</td>
<td>AM160</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td></td>
<td>This proposed modification certainly does alter the context of the policy. Although the AM is in line with the weak approach set out in the NPPF it is a weakening of the current level of protection given under the adopted development plan for South Hams. Proposed modifications do not address requirements for development to &quot; Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests. Those in the AONBs should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1. Areas in the setting of protected landscapes should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1.&quot; Added to the policy. I feel this is reasonable given that other development policies, such as DEV34, also contain more detailed requirements.</td>
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<tr>
<td>109</td>
<td>1095125</td>
<td>AM161</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT.AM161 fully addresses the issue raised that the policy ought to recognise that AONBs have 'special qualities' and 'distinctive characteristics', whilst National Parks have 'special qualities' and 'valued attributes'. Proposed modifications do not address requirements for development to &quot; Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests. Those in the AONBs should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1. Areas in the setting of protected landscapes should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1.&quot; Added to the policy. I feel this is reasonable given that other development policies, such as DEV34, also contain more detailed requirements.</td>
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<tr>
<td>110</td>
<td>1095125</td>
<td>AM162</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT.AM162 fully addresses the issue raised and provides even greater specificity which is openly welcomed. Proposed modifications do not address requirements for development to &quot; Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests. Those in the AONBs should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1. Areas in the setting of protected landscapes should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1.&quot; Added to the policy. I feel this is reasonable given that other development policies, such as DEV34, also contain more detailed requirements.</td>
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<tr>
<td>111</td>
<td>1095125</td>
<td>AM163</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT.AM163 fully addresses the issue raised. Proposed modifications do not address requirements for development to &quot; Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests. Those in the AONBs should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1. Areas in the setting of protected landscapes should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1.&quot; Added to the policy. I feel this is reasonable given that other development policies, such as DEV34, also contain more detailed requirements.</td>
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<tr>
<td>112</td>
<td>1095125</td>
<td>AM164</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT.AM164 fully addresses the issue raised. Proposed modifications do not address requirements for development to &quot; Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests. Those in the AONBs should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1. Areas in the setting of protected landscapes should adhere to at least the Institute of Lighting Professionals (ILP) Environmental Zone E1.&quot; Added to the policy. I feel this is reasonable given that other development policies, such as DEV34, also contain more detailed requirements.</td>
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<td>115</td>
<td>1095125</td>
<td>AM165</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT in full the additional text proposed.</td>
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<tr>
<td>116</td>
<td>1095125</td>
<td>AM165</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT in full the additional text proposed.</td>
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<tr>
<td>114</td>
<td>1095125</td>
<td>AM166</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT in full the additional text proposed.</td>
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<td>61</td>
<td>658611</td>
<td>AM167</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM167 The various changes to policy DEV37 regarding flood risk and drainage are in accordance with what we agreed in our SoCG. We consider that these changes strengthen this ambitious and holistic policy encompassing the whole water environment.</td>
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<tr>
<td>62</td>
<td>658611</td>
<td>AM168</td>
<td>Marcus Salmon Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM168 The various changes to policy DEV37 regarding flood risk and drainage are in accordance with what we agreed in our SoCG. We consider that these changes strengthen this ambitious and holistic policy encompassing the whole water environment.</td>
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<td>658611</td>
<td>AM169</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM169 The various changes to policy DEV37 regarding flood risk and drainage are in accordance with what we agreed in our SoCG. We consider that these changes strengthen this ambitious and holistic policy encompassing the whole water environment.</td>
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<tr>
<td>23</td>
<td>658611</td>
<td>AM17</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM17 Inclusion of additional text in paragraph 3.83 (relating to SPT11) which highlights the important role a healthy environment plays in protecting water quality and managing flood risk.</td>
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<td>64</td>
<td>658611</td>
<td>AM170</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM170 The various changes to policy DEV37 regarding flood risk and drainage are in accordance with what we agreed in our SoCG. We consider that these changes strengthen this ambitious and holistic policy encompassing the whole water environment.</td>
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<td>65</td>
<td>658611</td>
<td>AM171</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM171 Clarifications regarding flood risk responsibilities, surface water and avoidance of combined sewers to the narrative text supporting policy DEV37 in paragraphs 6.137 and 6.138 are as agreed in the SoCG.</td>
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<td>66</td>
<td>658611</td>
<td>AM172</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM172 Clarifications regarding flood risk responsibilities, surface water and avoidance of combined sewers to the narrative text supporting policy DEV37 in paragraphs 6.137 and 6.138 are as agreed in the SoCG.</td>
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<td>67</td>
<td>658611</td>
<td>AM173</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM173 Clarifications regarding flood risk responsibilities, surface water and avoidance of combined sewers to the narrative text supporting policy DEV37 in paragraphs 6.137 and 6.138 are as agreed in the SoCG.</td>
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<td>117</td>
<td>1095125</td>
<td>AM173</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>Support</td>
<td>SUPPORT. AM173 addresses the substantive issues raised that this needs to cover all types of buildings or structures rather than limited to dwellings.</td>
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<tr>
<td>68</td>
<td>658611</td>
<td>AM174</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM174 Whilst not our recommendation we welcome the clarification in DEV38.5 about replacement building rather than being limited to just dwellings. However, we have just noticed how the plan’s Costal Change Management Areas (CCMA) have been mapped on the Policies Map for the South Hams part of the Thriving Towns and Villages policy area. There does not appear to be a clear rationale for why some areas are shown as CCMA whilst others are not. For example, the coast adjacent to Slapton Ley is not designated CCMA although the Shoreline Management policy for this part of the coast is for ‘managed realignment’. Meanwhile many estuary locations including where there are allocations (e.g. TTV6 Noss-on-Dart) are designated as CCMA.</td>
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<td>118</td>
<td>1095125</td>
<td>AM174</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>Support</td>
<td>SUPPORT. AM174 addresses the substantive issues raised that this needs to cover all types of buildings or structures rather than limited to dwellings.</td>
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<tr>
<td>119</td>
<td>1095125</td>
<td>AM175</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>Support</td>
<td>SUPPORT the purpose of the additional text proposed regarding European Sites, but suggest ‘avoid’ rather than ‘avoiding’. SUPPORT. I fully support the addition of the explicit wording regarding affordable housing. This will be especially important in the AONBs in the TTVPA.</td>
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<td>69</td>
<td>658611</td>
<td>AM179</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM179 Addition of ‘waterbody classification’ to the list of indicators for monitoring in Annex 2.</td>
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<tr>
<td>83</td>
<td>1095125</td>
<td>AM18</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>Support</td>
<td>SUPPORT fully. The proposed modifications address the matters raised.</td>
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<tr>
<td>84</td>
<td>1095125</td>
<td>AM20</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>Support</td>
<td>SUPPORT.</td>
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</table>
We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM32 Inclusion of clarifying text to PLY20 regarding consideration of local flood risk management strategies as agreed in our SoCG.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM33 Additional text to paragraph 1.93 requiring the councils to work with the Environment Agency and other stakeholders to develop suitable strategies for the management of coastal flood risk, in accordance with our SoCG.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM36 Addition of new text to the Sutton Harbour policies PLY23, PLY24, PLY25 and PLY26 requiring ‘flood resistant and resilient design and contributions towards the upgrade and improvement of existing flood defences (as set out in line with Environment Agency advice)’.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM37 Addition of new text to PLY23, PLY24, PLY25 and PLY26 requiring ‘flood resistant and resilient design and contributions towards the upgrade and improvement of existing flood defences (as set out in line with Environment Agency advice)’.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM39 Addition of new text to the Sutton Harbour policies PLY23, PLY24, PLY25 and PLY26 requiring ‘flood resistant and resilient design and contributions towards the upgrade and improvement of existing flood defences (as set out in line with Environment Agency advice)’.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM41 Additional text to policies PLY30 and PLY31 requiring measures to ensure the improvement of surface water management.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM42 Additional text to policies PLY30 and PLY31 requiring measures to ensure the improvement of surface water management.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM45 Replacement text in policy PLY32 to ensure the improvement of surface water and safeguard the waterfront from coastal flooding.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM53 Additional text to policy PLY33 requiring measures to ensure the improvement of surface water management.

We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM54 The document states that this modification relates to PLY34 but we would question whether it should apply to PLY35. Nonetheless, we support the commitment to safeguard development and people from coastal flooding as agreed in the SoCG.
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<thead>
<tr>
<th>Comment ID</th>
<th>Consultee ID</th>
<th>Mod Ref.</th>
<th>Full Name (Agent)</th>
<th>Organisation (Agent)</th>
<th>Full Name (Consultee)</th>
<th>Organisation (Consultee)</th>
<th>Original Comment</th>
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<tr>
<td>35</td>
<td>658611</td>
<td>AM55</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM55 The document states that this modification relates to PLY35 but we would question whether it should apply to PLY34. Nonetheless, the additional text requiring measures to ensure the improvement of surface water management is agreed in the SoCG.</td>
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<tr>
<td>22</td>
<td>1069486</td>
<td>AM57</td>
<td>Rob Sanderson</td>
<td>Defence Infrastructure Organisation</td>
<td>In relation to the proposed changes to Policy PLY37, (your ref. AM57), MOD objects to the proposed wording of point 9 of the policy. The first sentence reads: ‘Upgrading of flood defences, maritime and harbourside infrastructure...’ However, i.e is concerned with monitoring the breakwaters and existing structures and ensuring the ‘current benefits are retained’, rather than ‘upgrading’. More fundamentally, while MOD accepts that the Breakwater is key strategic infrastructure for MOD, for the safe harbouring of ships on the buoys in the Sound and also that the Breakwater may have an effect on wave action, it is not intended to contribute towards flood defence. Any monitoring of its condition is undertaken by MOD for its own purposes.</td>
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<td>37</td>
<td>658611</td>
<td>AM57</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM57 The changes to PLY37 point 9 regarding coastal infrastructure are as agreed between the councils and this Agency during the examination process. We note that whilst the Defence Infrastructure Organisation were involved in the discussions they did not agree to the text. We consider that this change has attempted to satisfy the DIO’s concerns regarding liability. Meanwhile it ensures that developers and stakeholders can be confident of the council’s commitment to maintain the current benefits offered to the waterfront by the breakwaters over the lifetime of development.</td>
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<td>38</td>
<td>658611</td>
<td>AM60</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM60 For the Sherford policy PLY48, the inclusion of a new point regarding the provision of SuDS and blue/green corridors to control pollution and flood risk management as agreed in the SoCG.</td>
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<td>12</td>
<td>232720</td>
<td>AM62</td>
<td>Dr Ed Moffatt</td>
<td>Diocese of Exeter</td>
<td>The original consultation response that led to AM62 in PLY48 was intended to replace the phrase ‘multi-faith building’ with ‘places of worship’ as per SPT2.9 and the S106 agreement. Instead, the terms have been combined (‘multi-faith building / places of worship’). Please can the words ‘multi-faith building /’ be removed to reflect the intention of the original submission.</td>
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<td>39</td>
<td>658611</td>
<td>AM65</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM65 Changes for policy PLY56.4 and PLY56.5 in respect of flood risk management and contamination investigation and remediation.</td>
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<td>40</td>
<td>658611</td>
<td>AM66</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM66 Changes for policy PLY56.4 and PLY56.5 in respect of flood risk management and contamination investigation and remediation.</td>
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<td>41</td>
<td>658611</td>
<td>AM67</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM67 Changes for policy PLY56.4 and PLY56.5 in respect of flood risk management and contamination investigation and remediation.</td>
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<td>42</td>
<td>658611</td>
<td>AM68</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM68 Changes for policy PLY56.4 and PLY56.5 in respect of flood risk management and contamination investigation and remediation.</td>
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<td>43</td>
<td>658611</td>
<td>AM70</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM70 Inclusion of clarification to PLY58.12 regarding surface water flood risk as agreed in the SoCG.</td>
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<td>44</td>
<td>658611</td>
<td>AM71</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following. Additional Modifications: AM71 Inclusion of clarification to PLY58.13 regarding flood resistant and resilience design in this surface water flood risk location in accordance with the SoCG.</td>
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<td>Comment ID</td>
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<td>45</td>
<td>658611</td>
<td>AM74</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM74 Addition to PLY60.2 to ensure provision of a safe access/egress route in times of flooding.</td>
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<td>46</td>
<td>658611</td>
<td>AM75</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM75 The changes to PLY60.6, PLY60.7 and PLY60.8 to ensure development is safe and does not increase flood risks elsewhere.</td>
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<tr>
<td>47</td>
<td>658611</td>
<td>AM76</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM76 The changes to PLY60.6, PLY60.7 and PLY60.8 to ensure development is safe and does not increase flood risks elsewhere.</td>
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<td>48</td>
<td>658611</td>
<td>AM77</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM77 The changes to PLY60.6, PLY60.7 and PLY60.8 to ensure development is safe and does not increase flood risks elsewhere.</td>
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<td>87</td>
<td>1095125</td>
<td>AM85</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT.</td>
<td></td>
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<td>3</td>
<td>1096244</td>
<td>AM86</td>
<td>Jonathan Stoddart</td>
<td>CBRE Ltd</td>
<td>AM86: Policy TV3 – Strategic Measures for the Main Towns Premier Marinas supports AM86 as it is recognised that the previous policy wording which made specific reference to a development project delivering infrastructure was not justified as part of a strategic infrastructure policy. Whilst Premier Marinas remains committed to delivering the ferry connection between its development at Noss Marina, and Dartmouth, and is subject to a planning condition to do so, there is no need for this element to be a planning policy requirement. However, the reference to this at Annex 1 – Infrastructure 5.6 he dul e (Page 339 of the Plan document) will also need to be deleted accordingly.</td>
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<td>15</td>
<td>1187545</td>
<td>AM87</td>
<td>Mrs Emma James</td>
<td>Okehampton Town Council</td>
<td>The Council strongly agrees with this policy, particular the need for improved public transport. With reference to Okehampton and Tavistock the reintroduction of rail services to the major cities of Exeter and Plymouth would assist greatly in alleviating congestion and provide alternatives to the use of cars.</td>
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<td>88</td>
<td>1095125</td>
<td>AM88</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT.</td>
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<tr>
<td>89</td>
<td>1095125</td>
<td>AM90</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT for some clarification on the landscaping requirements for open space and tree planting. Although it does not fully address the concerns raised by the South Devon AONB Unit.</td>
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<tr>
<td>90</td>
<td>1095125</td>
<td>AM91</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT. Inclusion of a density to help mitigate over dominance when viewed from surrounding countryside.</td>
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<tr>
<td>91</td>
<td>1095125</td>
<td>AM92</td>
<td>Ms Victoria Tanner-Tremaine</td>
<td>SUPPORT. The new point to provide a lighting strategy to minimise the impact of light spill into the surrounding countryside.</td>
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<td>10</td>
<td>1014031</td>
<td>AM93</td>
<td>Lesley Hughes</td>
<td>Ivybridge Town Council</td>
<td>AM93 figure 5.3 has the Ivybridge Vision Diagram which should incorporate spatial policy 3 for Ivybridge (now SP2). This also contradicts AM87 which refers to “a need for high capacity, public transport, cycling and walking measures, particularly in the towns of Ivybridge, Tavistock, Totnes and Okehampton, to alleviate congestion and encourage greater use of alternative modes of transport to the private car”. This statement is welcome but currently with no intention to deliver any improvements for Ivybridge. Overall the modifications merely reflect the major concerns that Ivybridge Town Council had at the hearing when promises were made by the Joint Councils about delivery for Ivybridge with the only part being delivered is the housing. No infrastructure is being provided yet policy MM22 refers to “ensuring the appropriate infrastructure is delivered”. No improved health facilities, no additional primary school investment, no highways or transport improvement and substantially reduced levels of employment land allocation. No efforts at all to deliver on infrastructure – just to ensure that at least 1078 houses are delivered and most allocated before the JLP is even adopted!!</td>
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<td>49</td>
<td>658611</td>
<td>AM95</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM95 Additions to the Stowford Mill policy TV11.1 requiring flood resistant and resilient development and a lead management plan.</td>
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<td>50</td>
<td>658611</td>
<td>AM96</td>
<td>Marcus Salmon</td>
<td>Environment Agency</td>
<td>We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM96 Additions to the Stowford Mill policy TV11.1 requiring flood resistant and resilient development and a lead management plan.</td>
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Comment ID | Consultee ID | Mod Ref. | Full Name (Agent) | Organisation (Agent) | Full Name (Consultee) | Organisation (Consultee) | Original Comment
---|---|---|---|---|---|---|---
51 | 658611 | AM97 | | | Marcus Salmon | Environment Agency | We welcome the proposed modifications which we consider will clarify and strengthen the plan policies and narrative. The changes are consistent with our agreed Statement of Common Ground (SoCG) and subsequent discussions during the Examination. In particular we support the following Additional Modifications: AM97 Addition of new text to paragraph 5.53 highlighting that water quality issues in the Salcombe to Kingsbridge SSSI must not be exacerbated by development. This was not one of our recommendations but we are strongly supportive of the addition.

74 | 1109045 | AM98 | | | Mr Leslie Pengelly | | Referring to: Modification AM98 Strategy for TTV Policy Area – Policy TTV14 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. REASON 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. Firstly, if the JL Councils were complying with DEV27, they would not have selected this site against the advice of the AONB unit & its LVA specialist. The AM98 changes appear to be a response to this extract in a letter from Natural England (attached to current October to December 2018 consultation).

’Site allocations We advise that you ensure that site specific conclusions set out in the Landscape Impact Assessments are reflected in Sustainability Appraisal and translated into the allocation policies, especially for those allocations within, or within the setting of, an Area of Outstanding Natural Beauty (AONB) or National Park. There currently is a disconnect between the two. For instance guidance set out in the Landscape Impact Assessment of TTV13 (the Quayside – Kingsbridge) and TTV14 (West of Belle Hill - Kingsbridge) is not reflected in policy criteria for these sites. For TTV14 the Landscape Impact Assessment flags up significant sensitivities for this site and states that development could adversely affect the setting of the AONB and result in significant visual impact. It is therefore important that the mitigation measures identified in the sensitivity analysis are reflected in the Sustainability Appraisal for the site and in the site policy criteria in TTV14. Where mitigation is required to ensure a site can meet the tests in NPPF para 116, it is important that this is clearly reflected in the SA/SEA and in Plan policy’. The changes made are irrelevant. ‘Strategic landscaping within the site boundaries and the creation of a landscape framework throughout the site WILL NOT WORK. The site is too steep and will necessarily contain extensive retaining wall construction & underground attenuation tanks throughout the site, making any landscaping within the site impossible. The site will appear much like Saffron Park in Kingsbridge, which was widely criticised when it was constructed, but that site is low down in Kingsbridge. These type of sites on highly visible hillsides, where they herd the buildings into the middle of the fields as proposed, will be seen as a gross mistake and landscaping of this site will be a failure. They are becoming baron sites devoid of any visible wildlife (or trees) within the built area. I can see nothing within the changes to paragraph 2 that will deal with the prominence of the site and the deletions appear to be through embarrassment of the harm that this site will cause to the AONB. The outline planning application has been submitted and approved and there is no landscaping within the two built up areas, which are effectively 49 dwellings in the middle of one field and 45 dwellings in the middle of the other field, with no landscaping possible within either blocks. Nor will anyone wish for their views to be obliterated by landscaping. This will be another classic example where buildings are put up for views of an outstanding area of natural beauty, but those same buildings will destroy the views within the AONB itself. Therefore I do not support the changes as they are meaningless.

92 | 1095125 | AM98 | | | Ms Victoria Tanner-Tremaine | | SUPPORT and OBJECT I support the inclusion of the creation of a landscape framework however I do not support the deletion of “to mitigate any adverse visual impact on the AONB, and to soften the edges of the development which borders the undeveloped countryside” as this sets out what the landscape framework should achieve. Therefore its removal weakens the policy’s protection for the AONB.
I refer to the following policy, 'AM99 Strategy for TTV Policy Area – Policy 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'. When the LPA are in receipt and have approved an OPA for this site whereby it is known that this site will not and can not comply with the above paragraph, then presenting this statement to the JLP examination is dishonest at best. The LPA have approved an OPA for this site where the surface water drainage consists below ground attenuation tanks piped to the nearest valley stream that leads directly to the Salcombe to Kingsbridge SSSI site that has been given polluted status. The 'whole site below ground drainage surface water system' is connected to the valley stream by underground pipe as there are no suitable infiltration properties to the level required by a site that has a much higher building density that its neighbouring area. Therefore there will be NO delivery of 'landscape, biodiversity and amenity benefits'. The sites drainage CAN'T be met on site. And clearly, they will exasperate the polluted situation. So this statement is dishonest. This is true for sites TTV14, TTV15.1 (a commitment) and TTV15.2 (and the undeclared Garden Mill site of 32 dwellings) all of which could not provide (plans submitted) anything else but below ground attenuation tanks. They all provide underground tanks with no or inadequate cleaning of surface water sewer drainage that lead directly into the most polluted part of the SSSI site, the estuary upper reaches. This will also be true for TTV13. A total increase of 355 dwellings for Kingsbridge. All will drain surface water drainage into the SSSI site. All will also increase the largest sewage treatment output (Gerston point), another recognised source of pollutants. This matters because the Salcombe Kingsbridge estuaries is unique in the south Devon estuaries in not having a river to flush the estuary. The Salcombe Kingsbridge SSSI site also will also receive untreated surface drainage waters from the Green Park Way site at Chillington (65 dwellings - underground tanks, no cleaning)) and the Salcombe sites 53 dwellings (TTV29.19 - 13 dwellings, TTV29.20 - 20 dwellings & TTV29.21 - 20 dwellings) along with the undeclared site at Malborough Park, Malborough village (53 dwellings). This Malborough site does have a straight swale, but swales need to be 5 degrees or less in gradient to clean and the swale at Malborough is not less than 5 degrees in angle (1 metre drop in 15 metres). But as I state this is the secret undeclared site that is not in the JLP or neighbourhood plan (removed by the independent inspector). This is a total of 526 new dwellings all contributing to the SSSI sites woes.

The JLP LPAs need to be honest to this process and change the statements where they clearly know they cannot comply with their declared intent. Natural England need to have honest expectations and review the bleak situation and state how they intend to prevent further deterioration of the SSSI site.
**Comment ID** | **Consultee ID** | **Mod Ref.** | **Full Name (Agent)** | **Organisation (Agent)** | **Full Name (Consultee)** | **Organisation (Consultee)** | **Original Comment**
---|---|---|---|---|---|---|---
70 | 1095122 | DEV6 | Steve Simms | SSA Planning Limited | Kentucky Fried Chicken (Great Britain) Limited | PLEASURELY PREPARED The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of secondary schools as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed. In fact, the distance chosen could have the effect of banning hot food takeaways from a significant part of urban areas. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts. The policy is negative in its assumptions, assuming that hot food takeaways must necessarily have health impacts, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. Food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets. Focussing on Class A5 uses is both unhelpful and unfair. JUSTIFIED There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to secondary schools and only limited evidence of any correlation at all, so it is unclear how refusing permission for hot food takeaways within 400 m of such locations could ever be justified. No evidence is offered of any threshold number of hot food takeaways or distance at which the harm the draft policy seeks to mitigate occurs or is noticeably greater. Indeed, there is no evidence of a causal spatial link between clusters of hot food takeaways and the incidence of obesity or overweight at all. It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of provision outside centres. As it is impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres. In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to a healthy offer in the widest sense, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem for reasons that cannot be evidenced. On a practical point, using distance radii takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones. EFFECTIVE Some hot food takeaways, together with restaurants, pubs and some shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. Indeed, by treating all operators of hot food takeaways in the same way, the policy disincentivises others from voluntary measures such as those taken by respondent to reformulate recipes to reduce their fat, salt and sugar content and to inform and encourage healthy choices such as salad and grilled chicken. Because data on causality does not exist, it is hard to see how the effectiveness of the policy could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken if national health and obesity levels, but activity level is the other that must be considered for a complete picture. Focussing on improving walkability and access to open space, sport and recreation facilities would be a far more effective strategy for reducing obesity. CONSISTENT WITH NATIONAL POLICY We consider that no regard has been given to national policy and advice in preparing the policy because no National Planning Policy Framework (NPPF) policies deal with dietary issues. Specifically, taking into account proximity of hot food takeaways to schools has no basis in national policy and the practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services and facilities is directly contrary to national policy and will tend to encourage unsustainable travel. The NPPF recognises the role planning takes in better enabling people to lead healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. The PPG does now refer to limiting proliferation and proximity to locations such as schools, but it does not state what to limit the proliferation of. Even if one assumes this means hot food takeaways, it refers to limiting proliferation, not bars and leaves plans making authorities to provide evidence for such an approach case by case."

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2 | 1187228 | Eastern Corridor | Mr Roy Russell |  |  |  | The JLP is indeed a good indication of your overall proposals for the East Plymouth Corridor, but makes no mention of the Harewood Park Facilities or in particular the Bowling green and clubhouse within the Park!! With the enormous increase of people involved in the plan, there would appear to be mention of majority of sports and the importance of sport to assist in healthy living to prevent the drain on local health centres and community health services, but there is no indication of improving the present facilities to cope with the influx of people. The present Lawn Green Bowling Club provides a service to the community in the way of healthy exercise for any age group but mainly the retired members of the community whom, we are told, are the largest user of health service facilities. The bowling facilities at Plympton are not in adequate condition to cope with the present load so how do you suggest this service to the community can cope with the increase to which is your intention. This matter needs to be addressed as a matter of some urgency!!! Spend some money on the present bowling facilities to bring them up to modern day standards!!!

4 | 1010006 | General | Louise Dale | DIO Safeguarding Defence Infrastructure Organisation |  |  | Thank you for consulting the Ministry of Defence (MOD) in relation to the above referenced consultation document. DIO Safeguarding have no comments to make regarding the proposed modifications. However, please may I use this an opportunity to identify Plymouth has several statutory safeguarding consultation zones within its district these being Ernestelle and Bull Point Royal Naval Armament Depot, Plymouth Sound and HMS Drake. Ernestelle and Bull Point RNAD and Plymouth Sound are surrounded by statutory explosive safeguarding consultation zones. There are two explosive safeguarding zones the Inhabited Building Distance (IBD) and the Vulnerable Building Distance (VBD). The Inhabited Building Distance (IBD) defined as yellow line on the statutory safeguarding map, within this safeguarding zone the MOD monitors the management and use of development to maintain public safety and tends to object to any persons living, working or congregating for long periods of time. The second consultation zone Vulnerable Building Distance (VBD) defined as a purple line on the statutory safeguarding line on the safeguarding plan. Within this zone all buildings should be deemed as being ‘non vulnerable’ that is of robust design and construction so that should an explosion occur at the MOD storage facility, buildings nearby will not collapse or sustain damage that could cause critical injury to the occupants. HMS Drake is a covered by the statutory technical consultation zone, the MODs principle concern relates to ensuring developments do compromise the operation of air navigational transmitters/receiver facilities located in the area. Therefore, this office requires to be consulted on all development which occupies our safeguarding consultation zones.
<table>
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<tr>
<th>Comment ID</th>
<th>Consultee ID</th>
<th>Mod Ref.</th>
<th>Full Name (Agent)</th>
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<th>Full Name (Consultee)</th>
<th>Organisation (Consultee)</th>
<th>Original Comment</th>
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<tbody>
<tr>
<td>5</td>
<td>1095657</td>
<td>General</td>
<td>Hannah Lorna Bevins</td>
<td>Wood</td>
<td>Spencer Jefferies</td>
<td>National Grid</td>
<td>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</td>
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<tr>
<td>11</td>
<td>1002212</td>
<td>General</td>
<td>Mike Deaton</td>
<td>Devon County Council</td>
<td></td>
<td></td>
<td>Thank you for the opportunity to comment on the Plymouth and South West Devon Joint Local Plan (JLP) Main Modifications Consultation. The County Council has worked closely in partnership with the JLP authorities throughout the preparation of the Plan and throughout the examination process. The County Council and the JLP authorities prepared and agreed a Statement of Common Ground prior to the hearings agreeing matters that are all addressed in the proposed Main and Additional Modifications. The County Council has no further comments to make regarding the proposed modifications and looks forward to working in partnership with the JLP authorities to deliver high quality, sustainable development across Plymouth, South Hams and West Devon.</td>
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<tr>
<td>17</td>
<td>1190381</td>
<td>General</td>
<td>Sam Balsdon</td>
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<td>Please find attached two plans. One shows the existing situation, the other shows the proposed situation. You and your team will note the existing situation whereby the Policy Line for PLY45 encompasses the land in red and veers away from the woodland edge. The Ecology Report confirms that the land in red is not really part of the woodland edge and consists of scrub and dumped materials therefore I do not think it should be included. The land in red is similar to the other piece of land I have (orange border) which has already been subject to a successful planning application which has lapsed but is hopefully going to be renewed. As you can see the plans have been drawn up already. The proposal is quite simply to move the PLY45 boundary slightly to take out the red land as it does not include the woodland edge, merely a piece of scrubland where fly tippers frequent. On that note, I will be sending some photographs soon about the red land. It has been a constant battle to try and stop the tipping. Nothing works. We put up fencing, they knock it down with the vehicles or lob stuff over the top. The amount of times we have cleared up. You will see tyres in Tory Brook and even a mattress that people have thrown over and it has made its way down to the brook. The Ecology report states it would be better environmentally if the red land was developed. Only regulation of this land through a dwelling will stop this practice and would encourage people to park behind the garages. Hardly anyone parks there because it is so well hidden and subject to criminal activity.</td>
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<tr>
<td>120</td>
<td>1016029</td>
<td>PMM15</td>
<td>Janice Balch</td>
<td></td>
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<td>PMM15 amends the boundary of TTV29.3 to show the undeveloped part of this employment site but the floorspace allocation of 11,300 sq m which relates to the whole site (developed and undeveloped parts) has not been reduced to correspond to the smaller site area. A current planning application ref 1631/17/OPA, on the undeveloped part of the site with boundaries as shown in PMM15, is for 4,211 sq m ‘built space’. The application drawings show a Gross Internal Area of some 6,591 sq m and the application is for a densely developed scheme. In this way the current figure of 11,300 sq m is shown to be significantly in excess of what the smaller site area can hold. The site was identified in the South Hams ‘Our Plan’ and in the JLP site framework as having significant constraints. Proposed Modification:- The site boundaries of TTV29.3 have been amended by PMM15. The floorspace of the site in TTV29.3 should be reduced to reflect the smaller site.</td>
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<tr>
<td>18</td>
<td>1190942</td>
<td>PPA Policy Map</td>
<td>Mrs Jane Fox</td>
<td></td>
<td></td>
<td></td>
<td>The evidence base relating to greenspace site 105 (Plympton Pathfields) is not given the correct overall value score. The site is therefore designated as Neighbourhood Greenspace when it should be designated as City Greenspace. The attributes for site 105 should be revalued and a higher overall value score given, as set out in the attached document.</td>
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<td>19</td>
<td>487799</td>
<td>PPA Policy Map</td>
<td>Mr Dennis Silverwood</td>
<td>Tamerton Foliot Village Conservation Society</td>
<td></td>
<td></td>
<td>Delete “Copleston Heights” (Allern Lane) development from City greenspace Include Conservation Area as City greenspace (currently local greenspace). This will require clarification of the greenspace designations. Include field to W of Cunningham Rd, Tamerton Foliot as Urban Fringe. It is clearly part of an important continuum. Consider changing the colouration of different types of ‘green’ areas. These can be difficult to identify, particularly when there is an overlay.</td>
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The inspectors review of the council LGS designation in EX15 states "Having considered this additional evidence we are concerned with the Councils' methodology and overall assessment". "The approach in the JLP is to designate a significant number of sites across the PPA which results in the designation being commonplace rather than of a limited and special nature". "Open spaces will be used by local communities for informal recreational uses including dog walking. However these are inevitably commonplace activities within urban areas. Sites may also contain varying levels of wildlife, beauty and tranquillity. Nevertheless the available evidence does not sufficiently demonstrate why sites are 'special' and of 'particular local significance' to distinguish them from other green areas and open spaces". "sites are already covered wholly or in part by other designations, including local nature reserves, county wildlife sites, conservation areas and tree preservation orders, or other policy protections including allotments, woodlands and biodiversity networks. Such areas are therefore already protected by national and local planning policies or through other legislation." "The Planning Practice Guidance states that landowners should be contacted at an early stage about proposals to designate any part of their land as LGS and have opportunities to make representations. There is little available evidence demonstrating that such landowners were contacted during the LGS selection process and that their comments have been robustly addressed within the assessments." As a response the council have now re-assessed the boundaries of areas and re-assessed the designation of areas. This is the first opportunity given to comment on the new boundary and designation of land related to PLY41. Within SGA1 - Part 2 page 29, Fig 33 Land Ownership, LDA documents the land in the greater boundary area and lists ALL landowners. At this very early stage the document fails to correctly allocate 6 acres of private land DN91278 & DN152135 as private ownership. No contact was made to the owner. To compound the error the land in question is designated as being owned by PCC (area section 24). Sites smaller than this were listed as private ownership, so size of the land is not the reason for this error. Within EN34 page 10 of 127 Derriford Community Park greater area is outlined. DN91278 & DN152135 is designated within this area. All parts are described as "Green spaces that are not accessible" to the general public. Within EN34A page 55 of 3755 surveyors "JS/ZG" state they have "Access to whole site" to conduct a Policy Area Open Space Assessment of site 9 "Derriford Community Park" on 27-Apr-15 from 11:10am for a duration of 10 (was this Minutes? Hours?). The diagram of the site accessed and assessed includes private land DN91278 & DN152135. At no point was permission requested to access private land, and at no point was permission granted to do so. Did "JS/ZG trespass to conduct the PAOSA? The whole site is assessed as nature reserve and Poole farm, DN91278 & DN152135 is neither of these. As such the cumulative score of 17 is not valid. Allocation of PLY41 boundary is now drastically different from the site 9 PAOSA area in EN34A it is based upon. PLY40 & PLY47 have reduced the areas tested in EN34A. Due to the information listed above I strongly reject DN91278 & DN152135 being included within the boundary of PLY41 and being designated as Strategic Green Space. The very basis of including DN91278 & DN152135 in SGA1 without contacting the legal owner disqualifies all future involvement. The matter of "JS/ZG" illegally accessing and assessing DN91278 & DN152135 within site 9 disqualifies all future involvement. The constant movement of the PLY41 boundary, being based on flawed site 9 assessment, which at best is only 50% the size of PLY41 disqualifies all future involvement of DN91278 & DN152135 within PLY41. By PCC designating DN91278 & DN152135 within PLY41 I would argue that the council are still exhibiting the previous issues described by the inspector in EX15, listed above. As the inspector has stated, there is already sufficient policy to protect green space and to manage development in the national planning policy. As such no designation of DN91278 & DN152135 to be within PLY41 is required. Remove DN91278 & DN152135 from PLY41. Do not designate DN91278 & DN152135 as any specific DEV29 category. Exclude DN91278 & DN152135 from any designation in the JLP.

9 1095641 TTV29.7 Paul Hornby Dartington Parochial Church Council Dear Sir, I am having difficulty accessing the main site so I hope you will forward my objection to the appropriate officer. My objection relates to the continued inclusion of the Broom Park as a possible housing/mixed use site. I had hoped and expected this site to be excluded in the modifications to the plan. The site is elevated and with an overview which will be detrimental to the environment of the settlement of Dartington. The site has no current access and the provision of this will involve considerable erosion to the rural nature of the immediate area. Yours, Paul Hornby

71 1004109 TTV9 Cllr Michael Blake There appears to be dual standards If land up to Dartmoor National Park from Ivybridge needing protection why does this not apply to the relevant land at Bickleigh which lies outside the urban Fringe?

72 1096832 TTV9 Mrs Linda Crowe If land from Ivybridge to Dartmoor National Park needed protection WHY does this NOT apply from this side at Bickleigh which is inside the Urban Fringe?

73 1096834 TTV9 Mr M Crowe If land from Ivybridge to Dartmoor National Park needed protection WHY does this NOT apply from this side at Bickleigh which is outside the Urban Fringe?

75 1007783 TTV9 Steve Clement Large Bickleigh Parish Council There appears to be dual standards If land up to Dartmoor National Park from Ivybridge needing protection why does this not apply to the relevant land at Bickleigh which lies outside the urban Fringe?
APPENDIX ONE: SUMMARY RESPONSE OF REPRESENTATIONS ON ADDITIONAL AND POLICY MAP MODIFICATIONS

Not related to any AM:
1. Twelve general representations not relating to any particular modification

AM1 Introduction - new para after para 1.18.
2. One representation, in support

AM2 Vision – ‘Strategic Objectives of Plan’ box
3. One representation, in support

AM3 Vision – ‘Strategic Objectives of Plan’ box
4. One representation, in support but with minor reservation about a clarification.
5. However, it is proposed to continue with the AM unaltered.

AM4 Vision – ‘Strategic Objectives of Plan’ box
6. One representation, in support

AM5 Spatial Strategy – para 3.4
7. One representation, in support

AM6 Spatial Strategy – Policy SPT2
8. One representation, in support

AM7-9
9. No representations

AM10 Spatial Strategy – new para after para 3.57
10. One representation, in support but with reservation, seeking more narrative.
11. However, it is proposed to continue with the AM unaltered.

AM11 Spatial Strategy – Policy SPT8
12. One representation, commenting on matter of detail that is not appropriate for this strategic policy
13. It is proposed to continue with the AM unaltered.

AM12 Spatial Strategy – para 3.66
14. One representation, in support

AM13-15
15. No representations
AM16 Spatial Strategy – para 3.74 (SPT9)
16. One representation, in support

AM17 Spatial Strategy – para 3.83
17. One representation, in support

AM18 Spatial Strategy – para 3.90
18. One representation, in support

AM19
19. No representations

AM20 Spatial Strategy – Policy SPT12
20. One representation, in support

AM21 Spatial Strategy – para 3.96
21. One representation, in support

AM22 Spatial Strategy – box after para. 3.105 (and consequential change in Annex 2)
22. One representation, in support

AM23-31
23. No representations

AM32 Strategy for Plymouth Policy Area – Policy PLY20
24. One representation, in support

AM33 Strategy for Plymouth Policy Area – para. 4.93
25. One representation, in support

AM34
26. No representations

AM35 Strategy for Plymouth Policy Area – Policy PLY23
27. One representation, in support

AM36 Strategy for Plymouth Policy Area – Policy PLY24
28. One representation, in support

AM37 Strategy for Plymouth Policy Area – Policy PLY25
29. One representation, in support
AM38
30. No representations

AM39 Strategy for Plymouth Policy Area – Policy PLY26
31. One representation, in support

AM40 Strategy for Plymouth Policy Area – Policy PLY29
32. One representation, in support

AM41 Strategy for Plymouth Policy Area – Policy PLY30
33. One representation, in support

AM42 Strategy for Plymouth Policy Area – Policy PLY31
34. One representation, in support

AM43-44
35. No representations

AM45 Strategy for Plymouth Policy Area – Policy PLY32
36. One representation, in support

AM46-52
37. No representations

AM53 Strategy for Plymouth Policy Area – Policy PLY33
38. One representation, in support

AM54 Strategy for Plymouth Policy Area – Policy PLY34
39. One representation, in support

AM55 Strategy for Plymouth Policy Area – Policy PLY35
40. One representation, in support

AM56
41. No representations

AM57 Strategy for Plymouth Policy Area – Policy PLY37
42. Two representations.
43. Environment Agency support; DIO object.
44. Great attempt was made to resolve the issue of how Plymouth Breakwater is described in the JLP, but agreement was not reached.
45. It is proposed to continue with the AM unaltered.
AM58-59
46. No representations

AM60 Strategy for Plymouth Policy Area – Policy PLY48
47. One representation, in support

AM61
48. No representations

AM62 Strategy for Plymouth Policy Area – Policy PLY48
49. One representation, in support, albeit seeking minor wording change
It is proposed to continue with the AM unaltered.

AM63-64
50. No representations

AM65 Strategy for Plymouth Policy Area – Policy PLY56.4
51. One representation, in support

AM66 Strategy for Plymouth Policy Area – Policy PLY56.4
52. One representation, in support

AM67 Strategy for Plymouth Policy Area – Policy PLY56.5
53. One representation, in support

AM68 Strategy for Plymouth Policy Area – Policy PLY56.5
54. One representation, in support

AM69
55. No representations

AM70 Strategy for Plymouth Policy Area – Policy PLY58.12
56. One representation, in support

AM71 Strategy for Plymouth Policy Area – Policy PLY58.13
57. One representation, in support

AM72-73
58. No representations

AM74 Strategy for Plymouth Policy Area – Policy PLY60.2
59. One representation, in support
60. One representation, in support

61. One representation, in support

62. One representation, in support

63. No representations

64. One representation, in support

65. One objection from Premier Marinas, who consider the reference to ferry connection is not necessary. However, the wording is less specific than the original and no change is proposed to the AM in response to this representation.

66. One representation, in support

67. One representation, in support

68. No representations

69. One representation, in support

70. One representation, in support

71. One representation, in support

72. One representation (Ivybridge Town Council) objecting to the adequacy of the diagram. It is considered that we have gone as far as we can with this now, and no further changes are proposed.
AM94
73. No representations

AM95 Strategy for TTV Policy Area – Policy TTV11.1
74. One representation, in support

AM96 Strategy for TTV Policy Area – Policy TTV11.1
75. One representation, in support

AM97 Strategy for TTV Policy Area – para 5.53
76. One representation, in support

AM98 Strategy for TTV Policy Area – Policy TTV14
77. Two representations
78. One objection relates more to the acceptability of the site than the AM proposed. The other partly supports the AM but considers it weakens the policy’s protection for the AONB, a point that is not agreed with.
79. No change is proposed to the AM.

AM99 Strategy for TTV Policy Area – Policy TTV14
80. Three representations, two in support
81. The objection questions the ability to achieve sustainable drainage but this is an opinion and not supported.
82. No change is proposed to the AM.

AM100 Strategy for TTV Policy Area – Policy TTV14
83. One representation, in support

AM101 Strategy for TTV Policy Area – Policy TTV15.2
84. One representation, in support

AM102 Strategy for TTV Policy Area – Policy TTV15.2
85. One representation, in support

AM103 Strategy for TTV Policy Area – Policy TTV15.2
86. Two representations, in support

AM104 Strategy for TTV Policy Area – Policy TTV17
87. One representation, in support

AM105-108
88. No representations
AM109 Strategy for TTV Policy Area – Policy TTV21
89. One representation, in support

AM110-112
90. No representations

AM113 Strategy for TTV Policy Area – Policy TTV27
91. One representation, in support

AM114
92. No representations

AM115 Strategy for TTV Policy Area – Policy TTV28.5
93. One representation, in support

AM116
94. No representations

AM117 Strategy for TTV Policy Area – Strategic Objective SO8
95. One representation, in support

AM118-127
96. No representations

AM128 Strategy for TTV Policy Area – Policy TTV29.19
97. One representation, in support

AM129-130
98. No representations

AM131 Strategy for TTV Policy Area – Policy TTV29.21
99. One representation, in support

AM132-135
100. No representations

AM136 Strategy for TTV Policy Area – Strategic Objective SO9
101. One representation, in objection. Concern that acknowledging that sustainable villages might serve wider networks, which they consider cuts across the concept of neighbourhood planning. This point is not agreed with.
102. No change is proposed to the AM.
No representations

**AM146 Development Policies – Policy DEV13**

104. One representation, in support

**AM147 Development Policies – Policy DEV13**

105. One representation, in support

**AM148-152**

106. No representations

**AM153 Development Policies – Policy DEV24**

107. Two representations, in support

**AM154 Development Policies – Policy DEV24**

108. One representation, in support

**AM155 Development Policies – para. 6.90**

109. One representation, in support

**AM156 Development Policies – Policy DEV25**

110. One representation, in support

**AM157 Development Policies – Policy DEV25**

111. One representation, in support

**AM158 Development Policies –para. 6.91 (which will split into 3 paras)**

112. One representation, in support

**AM159 Development Policies – Policy DEV27**

113. Two representations
114. One in support
115. One objection relates to light pollution issue which is not part of the AM and not a valid representation for this consultation process.
116. No changes are proposed to the AM.

**AM160 Development Policies – Policy DEV27**

117. One representation, which seems to be more of a comment and raises light pollution issue which is not part of the AM and not a valid rep for this consultation process.
118. No changes are proposed to the AM.
119. One representation, in support

120. One representation, in support

121. One representation, in support

122. One representation, in support

123. One representation, in support

124. One representation, in support

125. One representation, in support

126. One representation, in support

127. One representation, in support

128. One representation, in support

129. One representation, in support

130. One representation, in support

131. Two representations, in support

132. Two representations, in support
AM175 Delivery and Monitoring – para 7.21
133. One representation, in support

AM179 Annex 2 – Plan Targets and Direction of Travel Indicators
134. One representation, in support

Policies Map Modifications
135. A total of four representations received.
136. Two seek sites to be allocated as City Greenspace sites; however, for soundness it is important that we follow the evidence base and only place sites in this category which are justified by the methodology.
137. One seeks changes relating to Derriford community park which were the subject of previous representations.
138. One relates to PMM15 (which corrects an error in the submission policies map for TTV29.3). The comment however relates to employment floorspace and a planning application, not the correction of the site area itself.

Overall conclusions
139. No changes are proposed to the AMs or PMMs as a result of the representations.