

EXC10A - PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN – SCHEDULE OF POTENTIAL MINOR MODIFICATIONS (as at 13 December 2017)

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
M1	Vision – ‘Strategic Objectives of 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.	V Tanner-Tremaine	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)
M2	Vision – ‘Strategic Objectives of 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.	V Tanner-Tremaine	The modifications are considered to be helpful and consistent with the spatial strategy and development policies of the plan.
M3	Vision – ‘Strategic Objectives of Plan’ box	11. Delivering high quality development: To deliver development which is sustainable and of the right type for its location and of good quality.	V Tanner-Tremaine	The modifications are considered to be helpful clarifications.
M4	Spatial Strategy – para 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 ...	V Tanner-Tremaine	The modifications are considered to be helpful clarifications.
M5	Spatial Strategy – 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.	V Tanner-Tremaine	The modifications are considered to be helpful clarifications.
M6	Spatial Strategy – 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.	Dartmoor National Park Authority	The modifications are considered to be helpful clarifications.
M7	Spatial Strategy – Policy SPT7	NEW POINT Cooperate with the Tamar Valley and South Devon AONB Partnerships in the implementation	Devon County Council	Although this is an additional point to the policy, it merely states an intent

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		of the plan's policies for conserving the landscape and scenic beauty of the AONBs.		which the LPAs are already committed to. It could equally be referenced in the narrative that follows the policy, or even taken as read.
M8	Spatial Strategy – new para after para 3.57	Additionally, given its roles and responsibilities for 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.	Devon County Council	We are happy to agree to some narrative which explains the role of Devon County Council
M9	Spatial Strategy – Policy SPT8	3iv. Supporting improvements to local rail connectivity and links between Tavistock and Plymouth and Okehampton and Exeter.	n/a	This minor modification is proposed by the LPAs as an update.
M10	Spatial Strategy – para 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 ...	n/a	This minor modification is proposed by the LPAs as an update.
M11	Spatial Strategy – para 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 ...	Devon County Council	The modifications are considered to be helpful clarifications.
M12	Spatial Strategy – Policy SPT11	The distinctive characteristics, special and unique qualities and valued features of the natural environment of the Plan Area will be protected, conserved and enhanced. This will be through a strategic approach which takes account of protects the hierarchy of legal status international, national and locally designated sites, commensurate with their status, and takes account of the natural infrastructure functions of different sites,	Natural England Devon County Council S Devon AONB V Tanner-Tremaine RSPB	These wording changes reflect more precisely NPPF wording without changing the overall intent of the policy. The policy structure has been adjusted to provide greater clarity.

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		habitats and features. Key principles include:		
M13	Spatial Strategy – Policy SPT11	NEW POINT. Avoiding harmful impacts on existing features as a first principle, and where harmful impacts are unavoidable, to ensure that such impacts are adequately and proportionately mitigated or as a last resort fully compensated.	Natural England S Devon AONB V Tanner-Tremaine RSPB	These modifications move to SPT11 the provisions of Policy DEV28.3 iii, in modified form to more precisely reflect NPPF language. There is no material change to the in-combination effects of the original SPT11 and DEV28.
M14	Spatial Strategy – Policy SPT11	1. Protecting Sites of European and national significance for biodiversity and conservation will be afforded the highest level of protection. These include existing and potential Special Protection Areas, existing possible and candidate Special Areas of Conservation, existing and proposed Ramsar sites and sites identified, or required, as compensatory measures for harmful impacts on European sites. Development affecting such sites will only be permitted where: i A suitable and less harmful alternative location, design or form of development cannot be achieved. ii The benefits substantially outweigh the impacts on the features of interest. iii The impacts can be fully mitigated and/or compensated.	Natural England S Devon AONB V Tanner-Tremaine	The modification brings forward some of the provisions currently in DEV28 and moves some provisions to DEV28 (as part of adjusting the structure of the policy. There is no material change to the in-combination effects of the original SPT11 and DEV28.
M15	Spatial Strategy – Policy SPT11	NEW POINT. Protecting Sites of national significance for biodiversity and conservation. These include Sites of Special Scientific Interest, National Nature Reserves, Ancient Woodlands and Marine Conservation Zones.	Natural England S Devon AONB V Tanner-Tremaine Woodland Trust	The modification separates nationally important sites from internationally important sites. SPT11 as submitted had them in the same point. This modification provides greater clarity. It also brings forward provisions in DEV28. There is no material change to the in-combination effects of the original SPT11 and DEV28.
M16	Spatial Strategy – Policy SPT11	2. Conserving and enhancing the landscape and scenic beauty of the South Devon and the Tamar Valley Areas	Natural England Dartmoor National	The modification moves some provisions to DEV28 (as part of

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		of Outstanding Natural Beauty, and the adjacent Dartmoor National Park and their settings. ,are given the highest status of protection in relation to landscape and scenic beauty. Great weight will therefore be given to conserving the landscape and scenic beauty of these designations and their settings. Major development in these areas will only be permitted in exceptional circumstances, and where it is in the public interest.	Park Authority	adjusting the structure of the policy. It also more precisely reflects NPPF wording. There is no material change to the in-combination effects of the original SPT11 and DEV28.
M17	Spatial Strategy – Policy SPT11	3. Protecting and enhancing the distinctive landscapes of the Undeveloped Coast will be protected and enhanced, particularly within the South Devon Heritage Coast, with support for improvements to public access to and enjoyment of the coast.	Natural England	This modification follows from the modified structure of the policy.
M18	Spatial Strategy – Policy SPT11	Additionally, great weight will be given to the need to Safeguarding the landscape setting of the Cornwall and West Devon Mining Landscape World Heritage Site.	Natural England	This modification follows from the modified structure of the policy.
M19	Spatial Strategy – Policy SPT11	and to Supporting innovative and sustainable solutions within the North Devon Biosphere Transition Zone in accordance with the Biosphere Strategy for Sustainable Development.	Natural England UK Committee for UNESCO MaB Programme	This modification follows from the modified structure of the policy.
M20	Spatial Strategy – Policy SPT11	4. Conserving and enhancing a functional network across the Plan Area of greenspace and geodiversity sites of regional and local importance will be identified to ensure a functional green network is achieved that meets the needs of communities and wildlife. These include: i. Strategic Landscape Areas (Plymouth Policy Area) - providing a strong landscape context for Plymouth. ii. Strategic Greenspaces (Plymouth Policy Area) - large scale sites to be proactively enhanced to provide a focus for people's interaction with nature. iii. Local Green Spaces (Plymouth Policy Area) -	Natural England V Tanner-Tremaine	This modification follows from the modified structure of the policy. Some content has been brought forward from DEV28 and an erroneous reference to Plymouth Policy Area deleted. There is no material change to the in-combination effects of the original SPT11 and DEV28.

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		<p>providing multiple benefits to communities and wildlife.</p> <p>iv. Local Nature Reserves - designated for their benefits for wildlife and providing communities with access to nature.</p> <p>v. County Wildlife Sites and County Geological Sites - designated for their high wildlife and geodiversity value and other priority sites supporting Biodiversity Action Plan habitats and species.</p> <p>vi. The ecological networks of wildlife corridors and stepping stones that connects these sites including areas identified for habitat restoration and creation.</p>		
M21	Spatial Strategy – Policy SPT11	<p>5. The need to Improving links to and along regional and national walking and cycling routes, including the South West Coast Path national trail and the National Cycle Network will be a weighty consideration in planning and development in the Plan Area.</p>	Natural England	This modification follows from the modified structure of the policy.
M22	Spatial Strategy – Policy SPT11	<p>6. Protecting and extending the Public Rights of Way and bridleway s will be protected and the network extended as an essential element of the enjoyment of the natural environment.</p>	Natural England	This modification follows from the modified structure of the policy.
M23	Spatial Strategy – para 3.83	<p>... 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.</p>	Environment Agency	The modifications are considered to be helpful clarifications.
M24	Spatial Strategy – para 3.90	<p>... These designations and policy protections include the Tamar Valley and South Devon Areas of Outstanding Natural Beauty (AONBs) and 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 its international landscape significance. In respect of the National Park, although</p>	Dartmoor National Park Authority	The modifications are considered to be helpful clarifications.

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		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.		
M25	Spatial Strategy – 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change.
M26	Spatial Strategy – para 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 plan.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change
M27	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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change
M28	Strategy for Plymouth Policy Area – Policy PLY5 (title)	Safeguarding Sustainable use of Plymouth's mineral resources	Devon County Council	The modifications are considered to be helpful clarifications.
M29	Strategy for Plymouth Policy Area – 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.	Devon Stone Federation	The modifications are considered to be helpful clarifications.
M30	Strategy for Plymouth Policy Area – Policy PLY5	3. Safeguarding key minerals related infrastructure and facilities needed to support the handling, processing and distribution of mineral resources.	Devon County Council; Devon Stone Federation	The modifications are considered to be helpful clarifications.
M31	Strategy for Plymouth Policy Area – Policy	4. The use of planning conditions and legal obligations to ensure the timely high quality restoration and aftercare	RSPB	We are happy to support this aspiration given that it is consistent with the Policy

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	PLY5	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.		DEV28.
M32	Strategy for Plymouth Policy Area – 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 and from the A38, avoiding Plympton's urban road network.	Devon Stone Federation	The modifications are considered to be helpful clarifications.
M33	Strategy for Plymouth Policy Area – 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 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.	Devon Stone Federation Devon County Council	The modifications are considered to be helpful clarifications.
M34	Strategy for Plymouth Policy Area – 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 ...	Devon Stone Federation	This minor modification is proposed by the LPAs as an update.

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M35	Strategy for Plymouth Policy Area – new para after para 4.26	In addition to providing for and safeguarding minerals extraction, the policy also protects key 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.	Devon County Council; Devon Stone Federation	Although we consider the provisions of PLY5 itself adequate to protect minerals infrastructure sites, we are content to identify particular sites that the policy provision would protect because they are minerals infrastructure that the policy intends to protect.
M36	Strategy for Plymouth Policy Area – Strategy for Plymouth Policy Area – Policy PLY6	2. Respects and celebrates the centre’s mid-twentieth century built heritage, including preserving and enhancing the Beaux Arts grid of the 1943 Abercrombie Plan and the highest and good quality non-designated assets identified in the City Centre Masterplan.	Historic England	The modifications are considered to be helpful clarifications.
M37	Strategy for Plymouth Policy Area – 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.	Historic England	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.
M38	Strategy for Plymouth Policy Area – 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 walking and cycling links.	Historic England	Amplifies the existing point but in a way that is already provided for elsewhere in the plan (Policy PLY20.2v)
M39	Strategy for Plymouth Policy Area – 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.	R Wheeler	Amplifies one dimension of public realm improvements and is entirely consistent with the policy intent.
M40	Strategy for Plymouth	11. Delivers proposals that are resilient and respond to	Environment	Helpful clarification which is supported

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	Policy Area – Policy PLY6	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.	Agency	and consistent with other parts of the plan, especially PLY37.7 & 9; SPT12 and DEV37.
M41	Strategy for Plymouth Policy Area – 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.	Historic England	The modifications are considered to be helpful clarifications.
M42	Strategy for Plymouth Policy Area – Policy PLY8	7. Conserving and enhancing the significance and settings of designated and non-designated heritage assets along Royal Parade.	Historic England	We are happy to agree this modification; the significance of these assets would have in any case been conserved and enhanced in accordance with Policy PLY8.1, DEV21 and DEV22.
M43	Strategy for Plymouth Policy Area – Policy PLY10	2. Buildings of between 5-6 storeys in height, with 6-8 storeys along Armada Way frontage , to reinforce the primacy of this principal thoroughfare from Plymouth Railway Station to the Hoe.	Historic England	The modifications are considered to be helpful clarifications and provide some amplification of the purpose behind the building heights provision.
M44	Strategy for Plymouth Policy Area – 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.	Historic England	The modifications are considered to be helpful clarifications.
M45	Strategy for Plymouth Policy Area – 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.	Historic England	The modifications are considered to be helpful clarifications.
M46	Strategy for Plymouth Policy Area – 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.	Historic England	The modifications are considered to be helpful clarifications.
M47	Strategy for Plymouth Policy Area – Policy	5. New build development on the existing surface level car park which optimises the use of the site but respects	Historic England	The modifications are considered to be helpful clarifications.

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	PLY15	conserves and enhances the historic and architectural interest and setting of the Civic Centre and Council House, Plymouth Theatre Royal and The Bank.		
M48	Strategy for Plymouth Policy Area – 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. ...	Plymouth College of Art	The modification adds some flexibility around delivery without impacting on its core purpose.
M49	Strategy for Plymouth Policy Area – Policy PLY20	8. Ensuring that development is resilient, responds 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.	Environment Agency	The modifications are considered to be helpful clarifications.
M50	Strategy for Plymouth Policy Area – 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.	Environment Agency	This modification simply provides a statement of intent on behalf of the Councils with no impact on the policy.
M51	Strategy for Plymouth Policy Area – 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	n/a	This modification addresses an error in the original drafting.

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		acting as a positive, memorable and widely visible landmark for the Sutton Harbour East area, Coxside.		
M52	Strategy for Plymouth Policy Area – Policy PLY23	NEW POINT 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.	Environment Agency	These requirements would have come from the implementation of Policy DEV37 and DEV20.I, but we are happy to amplify the site specific policy to confirm this to be that case.
M53	Strategy for Plymouth Policy Area – Policy PLY24	NEW POINT 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.	Environment Agency	These requirements would have come from the implementation of Policy DEV37 and DEV20.I, but we are happy to amplify the site specific policy to confirm this to be that case.
M54	Strategy for Plymouth Policy Area – Policy PLY25	NEW POINT 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.	Environment Agency	These requirements would have come from the implementation of Policy DEV37 and DEV20.I, but we are happy to amplify the site specific policy to confirm this to be that case.
M55	Strategy for Plymouth Policy Area – Policy PLY26	NEW POINT 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.	Environment Agency	These requirements would have come from the implementation of Policy DEV37 and DEV20.I, but we are happy to amplify the site specific policy to confirm this to be that case.
M56	Strategy for Plymouth Policy Area – Policy PLY27	I. High quality architecture that maximises the site's redevelopment potential whilst responding positively to the Hoe Conservation Area's historic character and the site's role as a strategic gateway to Armada Way. The design should be informed by a detailed heritage character assessment to be undertaken for the proposal and should preserve or enhance the character and appearance of the Hoe Conservation Area and Registered Park and Garden.	Historic England	The modifications are considered to be helpful clarifications.
M57	Strategy for Plymouth Policy Area – Policy	I. A development which preserves or enhances the character and appearance of the Hoe Conservation	Historic England	The modifications are considered to be helpful clarifications.

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	PLY28	Area and Registered Park and Garden respects the site's heritage assets and context , as informed by a detailed heritage character assessment to be undertaken for the proposal.		
M58	Strategy for Plymouth Policy Area – 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.	Environment Agency	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.
M59	Strategy for Plymouth Policy Area – Policy PLY30	3. A development which respects the site's heritage assets and context High quality design which preserves and enhances the setting of the adjacent listed buildings and Union Street Conservation Area , informed by a detailed heritage character assessment to be undertaken for the proposal.	Historic England	The modifications are considered to be helpful clarifications.
M60	Strategy for Plymouth Policy Area – Policy PLY30	NEW POINT East / West public linkages through the site to provide better connections through the area.	Historic England	We are happy to support this aspiration given that it is consistent with the policies DEV20.2 and DEV31.5.
M61	Strategy for Plymouth Policy Area – Policy PLY30	NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.	Environment Agency	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.
M62	Strategy for Plymouth Policy Area – Policy PLY31	4. A development which respects the site's heritage assets and context High quality design which preserves and enhances the setting of the adjacent listed buildings and Union Street Conservation Area , informed by a detailed heritage character assessment to be undertaken for the proposal. 5. High quality design which preserves and enhances the setting of the adjacent listed buildings and Union Street Conservation Area.	Historic England	The modifications are considered to be helpful clarifications.
M63	Strategy for Plymouth	NEW POINT East / West public linkages through the	Historic England	We are happy to support this aspiration

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	Policy Area – Policy PLY31	site to provide better connections through the area.		given that it is consistent with the policies DEV20.2 and DEV31.5.
M64	Strategy for Plymouth Policy Area – Policy PLY31	NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.	Environment Agency	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.
M65	Strategy for Plymouth Policy Area – 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.	Ministry of Defence	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.
M66	Strategy for Plymouth Policy Area – 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.	Ministry of Defence	Although it is not strictly necessary we are happy to accommodate this wording change
M67	Strategy for Plymouth Policy Area – 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.	Environment Agency	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.
M68	Strategy for Plymouth Policy Area – Policy	6. Retention of the small harbour and the site's slipways and marine recreational facilities.	Ministry of Defence	Although it is not strictly necessary we are happy to accommodate this

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	PLY32			wording change
M69	Strategy for Plymouth Policy Area – 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.	Ministry of Defence	The modifications are considered to be helpful clarifications.
M70	Strategy for Plymouth Policy Area – 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.	Ministry of Defence	Although it is not strictly necessary we are happy to accommodate this wording change
M71	Strategy for Plymouth Policy Area – Policy PLY32	10. Public art and other Appropriate measures to celebrate the military heritage of the site.	Ministry of Defence	Although it is not strictly necessary we are happy to accommodate this wording change
M72	Strategy for Plymouth Policy Area – Policy PLY32	12. Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the existing area.	Ministry of Defence	These provisions would be moved to front end of policy (see other modifications identified for this policy)
M73	Strategy for Plymouth Policy Area – Policy PLY32	13. Delivery of an access strategy to ensure that the transport impacts of the development are appropriately managed and mitigated. , having regard also to the operation of the port.	Ministry of Defence	We are happy to accommodate the deletion of this text which can be removed without affecting the substance of the provision.
M74	Strategy for Plymouth Policy Area – 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.	Ministry of Defence	The simplification of text can be accommodated without affecting the substance of the provision.
M75	Strategy for Plymouth Policy Area – Policy PLY33	NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.	Environment Agency	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.
M76	Strategy for Plymouth Policy Area – Policy PLY35	NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.	Environment Agency	These requirements would have come from the implementation of Policy DEV37, but we are happy to amplify the

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				site specific policy to confirm this to be that case.
M77	Strategy for Plymouth Policy Area – Policy PLY34	NEW POINT Safeguarding of development and people from coastal flooding.	Environment Agency	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.
M78	Strategy for Plymouth Policy Area – Policy PLY36.2	a. Site is within a conservation area therefore design will need to be in keeping with historic features conserve and enhance the significance including the setting of the heritage assets.	Historic England	The modifications are considered to be helpful clarifications.
M79	Strategy for Plymouth Policy Area – Policy PLY36.3	a. Site is within a conservation area therefore design will need to be in keeping with historic features conserve and enhance the significance including the setting of the heritage assets.	Historic England	The modifications are considered to be helpful clarifications.
M80	Strategy for Plymouth Policy Area – Policy PLY37	9. Upgrading of flood defences, maritime and harbourside infrastructure - including replacement of Sutton Harbour Lock Gate and Bridge – and improvements to West Pier, completion of flood defences around Millbay and strengthening delivering essential maintenance of the Breakwater in Plymouth Sound, as MoD defence related infrastructure that also helps give protection to the city's waterfront and its port and dockyard facilities.	Environment Agency Historic England	The modifications provide greater clarity about the nature of the infrastructure reflecting more closely the descriptions in the Infrastructure Needs Assessment. It should be noted that MoD are seeking deletion of reference to Plymouth Breakwater altogether, but this is not supported by the LPAs.
M81	Strategy for Plymouth Policy Area – 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.	Drake Circus Ltd	Although it is not strictly necessary we are happy to accommodate this wording change; however, given that a question has been raised about this provision in the Matters Issues and Questions for the Public Examination, the LPAs may reconsider whether an alternative modification is appropriate in respect of these provisions.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
M82	Strategy for Plymouth Policy Area – 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.	T Causland	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.
M83	Strategy for Plymouth Policy Area – Policy PLY44	Land at Woolwell Provision is made for in the order of 2,000 new homes (about 1,880 of which are anticipated to come forward within the plan period); with none occupied until the A386 Woolwell to the George Junction Transport Scheme has been implemented.	Boyer Planning	This modification is linked to the proposed change to point 2 below.
M84	Strategy for Plymouth Policy Area – Policy PLY44	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.	Boyer Planning	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.
M85	Strategy for Plymouth Policy Area – Policy PLY44	4 i Delivery of a new Community Park and that will form part of a network ...	n/a	Correction of grammatical error
M86	Strategy for Plymouth Policy Area – 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.	Boyer Planning Natural England	This modification improves the internal consistency of the plan, aligning the requirement to the provisions of Policy DEV28, and is considered a helpful clarification.
M87	Strategy for Plymouth Policy Area – 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	Devon County Council	This modification applies what would be required through the provisions of Policies DEV32 and DEL1 to this policy.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		appropriate contributions to mitigate the impact of the development on secondary schools in Plymouth.		
M88	Strategy for Plymouth Policy Area – Policy PLY46.13	NEW POINT Retention of the existing playing pitches, or re-provision to an equivalent or higher standard within the overall site.	Sport England	Although the allocation is for employment and sports pitches this modification adds some clarity about how the sports part of the allocation can be delivered.
M89	Strategy for Plymouth Policy Area – 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.	Environment Agency	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.
M90	Strategy for Plymouth Policy Area – Policy PLY48	7 ii Health and community facilities, including a town hall, library, youth centre and multi-faith building / places of worship.	Diocese of Exeter	We are happy to accommodate this minor change, to acknowledge that this policy provision supports SPT2.9
M91	Strategy for Plymouth Policy Area – 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.	Historic England	The modifications are considered to provide helpful specificity about the particular assets the provision relates to.
M92	Strategy for Plymouth Policy Area – Policy PLY56.4	d. Flood mitigation measures to ensure development is safe and does not increase flood risk elsewhere.	Environment Agency	The modifications merely explain the purpose of the provision, consistent with the wider policies of the plan.
M93	Strategy for Plymouth Policy Area – Policy PLY56.4	NEW POINT Investigation and remediation of contaminated land.	Environment Agency	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.
M94	Strategy for Plymouth Policy Area – Policy PLY56.5	c. Flood mitigation measures to ensure development is safe and does not increase flood risk elsewhere.	Environment Agency	The modifications merely explain the purpose of the provision, consistent with the wider policies of the plan.
M95	Strategy for Plymouth Policy Area – Policy PLY56.5	NEW POINT Investigation and remediation of contaminated land.	Environment Agency	We are happy to include this new point which reflects what would in any case have been required of a development

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				consistent with the other policies of the plan.
M96	Strategy for Plymouth Policy Area – 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.	Akkeron Group	This modification is considered helpful clarification of the primary provision of the policy.
M97	Strategy for Plymouth Policy Area – Policy PLY58.9	b. Contamination remediation. Investigation and remediation of contaminated land.	Environment Agency	We are content to agree the amended wording, which has the same effect as the original.
M98	Strategy for Plymouth Policy Area – Policy PLY58.12	b. Delivery of a sustainable urban drainage solution to provide an improvement to surface run off rates to and from the site.	Environment Agency	The modifications are considered to be helpful clarifications.
M99	Strategy for Plymouth Policy Area – Policy PLY58.13	NEW POINT Flood resistant and resilient design to address existing surface water issues.	Environment Agency	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.
M100	Strategy for Plymouth Policy Area – Policy 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.	Walker Developments	We are happy to include these modifications which will still achieve the primary outcome.
M101	Strategy for Plymouth Policy Area – Policy PLY59.11	NEW POINT A sensitively designed landscape scheme to minimise the impact of nearby highly graded heritage assets.	Historic England	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.
M102	Strategy for Plymouth Policy Area – Policy PLY59.12	+20 94 homes	Historic England	The modification of estimated housing capacity responds to further work on the historic environment.

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MI03	Strategy for Plymouth Policy Area – Policy PLY59.12	<p>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:</p> <ul style="list-style-type: none"> 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. Delivery of remedial work to the earthworks of Ernesettle Battery to facilitate it's removal from the Heritage at Risk Register. 	Historic England	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.
MI04	Strategy for Plymouth Policy Area – Policy PLY59.12	d. Development must include delivery of high quality publicly accessible greenspace to mitigate for the loss of greenspace and provide for enjoyment of the historic environment.	Historic England	The modification simply adds further clarification of the benefits of the provision to deliver public access.
MI05	Strategy for Plymouth Policy Area – Policy PLY59.18	NEW POINT Retention of existing playing pitch.	Sport England	We are happy to include this new point which is consistent with the requirements of other policies of the plan and is provided for in the planning consent for the site.
MI06	Strategy for Plymouth Policy Area – Policy PLY60.2	NEW POINT Provision of safe pedestrian access / egress route in times of flooding.	Environment Agency	We are happy to include this new point which is consistent with the requirements of other policies of the plan and is provided for in the planning

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				consent for the site.
M107	Strategy for Plymouth Policy Area – Policy PLY60.6	NEW POINT . Measures to ensure development is safe and does not increase flood risk elsewhere.	Environment Agency	We are happy to include this new point which is consistent with the requirements of other policies of the plan.
M108	Strategy for Plymouth Policy Area – Policy PLY60.7	NEW POINT Measures to ensure development is safe and does not increase flood risk elsewhere.	Environment Agency	We are happy to include this new point which is consistent with the requirements of other policies of the plan.
M109	Strategy for Plymouth Policy Area – Policy PLY60.8	NEW POINT Measures to ensure development is safe and does not increase flood risk elsewhere.	Environment Agency	We are happy to include this new point which is consistent with the requirements of other policies of the plan.
M110	Strategy for Plymouth Policy Area – Policy PLY60.11	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 environmental and heritage assessments.	Historic England	The modifications are considered to provide helpful specificity about the particular assets the provision relates to.
M111	Strategy for Plymouth Policy Area – Policy 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.	Strategic SW Developments	The modifications are considered to be helpful clarifications.
M112	Strategy for Plymouth Policy Area – Policy PLY60.11	NEW POINT Enabling development will be acceptable to facilitate the delivery of the sports facilities and the other provisions of this policy, provided that it is well related to the Coypool development, and it respects the urban fringe character of the site and does not break the skyline when the site is viewed from off-site locations to the south.	Strategic SW Developments	These modifications support the implementation of the policy and are consistent in setting enabling development in the context of policies to protect landscape character.
M113	Strategy for TTV Policy Area – Strategic Outcome for ‘our strategic approach to	South West Devon’s towns, villages and countryside communities will have contributed to achieving a prosperous and sustainable sub-region with a diverse rural economy, housing stock and rural services that	Historic England	Although it is not strictly necessary we are happy to accommodate these wording changes.

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	development in SW Devon'	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.		
M114	Strategy for TTV Policy Area – Strategic 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.	Natural England South Devon AONB V Tanner-Tremaine	We are happy to agree to these minor wording changes.
M115	Strategy for TTV Policy Area – Policy TTV1	Smaller villages, Hamlets and the Countryside - where development will be permitted only if it can be demonstrated that it fully to support the 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.	V Tanner-Tremaine Thurlestone Parish Council and Neighbourhood Plan	The modifications are considered to be helpful clarifications and consistent with the wider provisions of the plan (eg paras 3.10 and 5.153 which references the wider role of networks)
M116	Strategy for TTV Policy Area – Policy 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.	Historic England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M117	Strategy for TTV Policy Area – Policy TTV2	ADDITIONAL POINT The delivery of natural infrastructure, where appropriate, alongside new development.	Natural England	Although it is not strictly necessary we are happy to accommodate this minor modification which is consistent with each of the main town spatial priority policies and other policies that seek provision of appropriate infrastructure.
M118	Strategy for TTV Policy Area – para. 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	Devon County Council	Although it is not strictly necessary we are happy to accommodate this wording change as requested.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		such, proposals that contribute to securing rural public transport services will be encouraged, with developer contributions sought where appropriate.		
M119	Strategy for TTV Policy Area – Strategic Objective SO7	4. Protecting and enhancing local distinctiveness and historic character of the Main Towns.	Historic England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M120	Strategy for TTV Policy Area – Policy 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).	Premier Marinas (Dart) Ltd.	We are happy to remove what is arguably an over precise provision.
M121	Strategy for TTV Policy Area – para 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 lower order settlements, as well as supporting sustainable growth. The growth and function of Ivybridge, 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.	Devon County Council	The modifications provide a sharper clarified focus for the narrative that follows Policy TTV3
M122	Strategy for TTV Policy Area – para 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.	South Devon AONB	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M123	Strategy for TTV Policy Area – Policy TTV5	4. Strategic landscaping, open space, and tree planting to address the scale and prominence of the site...	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.

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MI24	Strategy for TTV Policy Area – Policy TTV5	5. A scale, density , design and southern extent of development which is not overly prominent when viewed from the surrounding countryside.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI25	Strategy for TTV Policy Area – Policy TTV5	NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.	Natural England	We are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.
MI26	Strategy for TTV Policy Area – Policy TTV6	2. Retention and improved provision of existing educational facilities.	Devon County Council	The modification is considered to be helpful clarification.
MI27	Strategy for TTV Policy Area – Policy 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, ...	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI28	Strategy for TTV Policy Area – Policy TTV6	7. Careful consideration and investigation of opportunities to ensure the future of un-designated heritage assets on site, and that the Scheduled Monument and its setting is conserved and enhanced.	Historic England	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.
MI29	Strategy for TTV Policy Area – Policy 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.	South Devon AONB V Tanner-Tremaine	The modifications are considered to be helpful clarifications.
MI30	Strategy for TTV Policy Area – Policy 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.	Environment Agency	The modifications are considered to be helpful clarifications consistent with other provisions of the plan.
MI31	Strategy for TTV Policy Area – Policy TTV6	NEW POINT Water quality management measures to protect the surrounding estuary.	Environment Agency	We are happy to include this new point which is consistent with the requirements of other policies of the plan.
MI32	Strategy for TTV Policy Area – Policy	NEW POINT Avoiding the loss of inter-tidal habitat; where loss cannot be avoided, it must be fully mitigated	Environment Agency	We are happy to include this new point which is consistent with the

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	TTV6	and/or compensated.		requirements of other policies of the plan.
MI33	Strategy for TTV Policy Area – para 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.	Historic England	We are happy to include this modification which relates to the planning application process and has no impact on the policy itself.
MI34	Strategy for TTV Policy Area – Policy TTV7	4. Maintaining Improving the existing retail offer, protecting the integrity of the town centre and enhancing its character.	Ivybridge Town Council	We are happy to accommodate this alternative wording as requested.
MI35	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 Ivybridge Neighbourhood Plan.	Ivybridge Town Council	This amplification is now able to be made given the status of the Ivybridge Neighbourhood Plan.
MI36	Strategy for TTV Policy Area – Policy TTV8	3. Strategic 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.	Ivybridge Town Council Natural England	These wording modifications and clarifications can be supported.
MI37	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI38	Strategy for TTV Policy Area – Policy TTV9	Land to the east of Ivybridge, at Filham, is allocated for housing. Provision is made for in the order of 200 new homes. Development should provide for and consider	n/a	This is the correction of a drafting inconsistency with other policies.

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		the following:		
MI39	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI40	Strategy for TTV Policy Area – Policy TTV9	NEW POINT Improved road and junction connections to the south of the A38.	Ugborough Neighbourhood Plan Working Group	This modification makes the policy consistent with Policy TTV8; the modification identifies matters that would arise through the application of other policies of the plan.
MI41	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI42	Strategy for TTV Policy Area – Policy TTV11.1	a. Sensitive renovation and re-use of heritage assets Conservation and enhancement of the heritage assets, delivering its renovation and reuse.	Historic England	We are happy to include these wording modifications to reflect more precisely NPPF language.
MI43	Strategy for TTV Policy Area – Policy TTV11.1	NEW POINT Flood resistant and resilient design, without increasing flood risk elsewhere.	Environment Agency	We are happy to include this new point which is consistent with the requirements of other policies of the plan and in any case provided for in the

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
				planning consent for the site.
MI44	Strategy for TTV Policy Area – Policy 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.	Environment Agency	We are happy to include this new point which is consistent with the requirements of other policies of the plan and in any case provided for in the planning consent for the site.
MI45	Strategy for TTV Policy Area – para 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.	Natural England	Although it is not strictly necessary we are happy to accommodate for in the wording change as requested.
MI46	Strategy for TTV Policy Area – Policy TTV12	NEW POINT Recognising the important role of the A381 link to Totnes and the need to maintain and improve public transport provision.	Kingsbridge Action Group	We are happy to support this locally added priority.
MI47	Strategy for TTV Policy Area – Policy 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.	South Devon AONB V Tanner-Tremaine Historic England Natural England	We are happy to add the amplification in the policy as to why high quality design is important, which is entirely consistent with other policies in the plan.
MI48	Strategy for TTV Policy Area – Policy 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.	Natural England	The caveat would in any case have been a legal requirement consistent with other policies in the plan.
MI49	Strategy for TTV	NEW POINT Sufficient space to allow the retention of	Natural England	We are happy to include this new point

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
	Policy Area – Policy TTV13	a tree canopy within and surrounding the site to conserve the green character of Kingsbridge in this area.		which is consistent with the requirements of other policies of the plan.
MI50	Strategy for TTV Policy Area – Policy TTV13	NEW POINT Investigation and remediation of contaminated land.	Environment Agency	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.
MI51	Strategy for TTV Policy Area – para 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.	Historic England	The modifications are considered to be helpful clarifications.
MI52	Strategy for TTV Policy Area – Policy TTV14	2. Strategic landscaping to 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.	Natural England	The modifications are considered to be helpful clarifications.
MI53	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.	Natural England	The caveat would in any case have been a legal requirement consistent with other policies in the plan.

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MI54	Strategy for TTV Policy Area – Policy TTV14	NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.	Natural England	We are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.
MI55	Strategy for TTV Policy Area – Policy 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.	Natural England	The modifications are considered to be helpful clarifications.
MI56	Strategy for TTV Policy Area – Policy TTV15.1	NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.	Natural England	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.
MI57	Strategy for TTV Policy Area – Policy TTV15.1	NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.	Natural England	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 and to satisfy legal requirements.
MI58	Strategy for TTV Policy Area – Policy 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.	Natural England	The modifications are considered to be helpful clarifications.
MI59	Strategy for TTV Policy Area – Policy TTV15.2	NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.	Natural England	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.
MI60	Strategy for TTV Policy Area – Policy TTV15.2	NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.	Natural England	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 and to satisfy legal requirements.
MI61	Strategy for TTV Policy Area – Policy	4. Enhancing the historic character and vitality of the town. centre	Historic England	The modifications are considered to be helpful clarifications.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
	TTV16			
MI62	Strategy for TTV Policy Area – Policy 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.	Devon County Council	Given the advice of the LEA, we are happy to modify the policy provision – reflecting what in any case could have been negotiated through planning applications pursuant to Policies DEV32 and DEL1.
MI63	Strategy for TTV Policy Area – Policy 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.	Okehampton Hamlets Parish Council	We are happy to agree with this proposed modification which also has the support of the Local Highway Authority, and can be recognized as a local priority.
MI64	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI65	Strategy for TTV Policy Area – Policy 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 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI66	Strategy for TTV Policy Area – Policy TTV18	10. A design and layout which is sensitive to conserves and where appropriate enhances the scheduled monument and its setting to the north west of the site and which respects the layout of the Roman Road running across the site which should be incorporated as part of the public realm.	Historic England	We are happy to include these wording modifications to reflect more precisely NPPF language.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
MI67	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI68	Strategy for TTV Policy Area – Policy TTV20	5. The delivery of a new primary school in the west of the town and expansion of existing schools.	Devon County Council	Given the advice of the LEA, we are happy to modify the policy provision – reflecting what in any case could have been negotiated through planning applications pursuant to Policies DEV32 and DEL1.
MI69	Strategy for TTV Policy Area – Policy TTV21	4. High quality design and layout that has regard to conserves and enhances the Tamar Valley Area of Outstanding Natural Beauty, the West Devon and Outstanding Universal Value of the Cornwall and West Devon Mining Landscape World Heritage Site, and the Dartmoor National Park and the Conservation Areas, and avoid mitigate for any impacts on these important designations and their settings.	Historic England	We are happy to include these wording modifications to reflect more precisely NPPF language.
MI70	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
MI71	Strategy for TTV Policy Area – Policy TTV21	NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.	Natural England	We are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
M172	Strategy for TTV Policy Area – Policy TTV22	I. Strategic landscaping including a 90m buffer along the west of the site 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M173	Strategy for TTV Policy Area – Policy TTV22	NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.	Natural England	We are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.
M174	Strategy for TTV Policy Area – Policy 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.	Natural England	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.
M175	Strategy for TTV Policy Area – Policy TTV24.1	NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.	Natural England	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.
M176	Strategy for TTV Policy Area – Policy TTV24.1	d. Provision and maintenance of a surface water drainage scheme.	Environment Agency	Agree that this can be deleted as covered by general policies of plan.
M177	Strategy for TTV Policy Area – Policy TTV24.2	a. Provision and maintenance of a surface water drainage scheme.	Environment Agency	Agree that this can be deleted as covered by general policies of plan.
M178	Strategy for TTV Policy Area – Policy TTV24.2	NEW POINT Strategic landscaping to the northern site boundaries and the retention and enhancement of existing hedgerows throughout the site.	Natural England	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.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
M179	Strategy for TTV Policy Area – Policy TTV24.2	NEW POINT Careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.	Natural England	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.
M180	Strategy for TTV Policy Area – Policy TTV24.5	c. An appropriate strategy to mitigate for any impact on the Dolvin Road AQMA and on the setting of Dartmoor National Park.	Dartmoor National Park Authority Natural England	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.
M181	Strategy for TTV Policy Area – Policy TTV24.5	NEW POINT Careful consideration of extent, scale and appearance of development to minimise local landscape impacts.	Natural England	We are happy to accommodate this minor modification which is consistent with policies of the plan relating to landscape impacts.
M182	Strategy for TTV Policy Area – para 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. ...	Devon County Council	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M183	Strategy for TTV Policy Area – Policy TTV27	7. A high quality form of development which integrates with the existing area and the setting of nearby heritage assets.	Historic England	The modifications are considered to be helpful clarifications.
M184	Strategy for TTV Policy Area – Policy TTV27	NEW POINT Investigation and remediation of contaminated land.	Environment Agency	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.
M185	Strategy for TTV Policy Area – Policy TTV28.4	NEW POINT Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.	Historic England	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.
M186	Strategy for TTV	a. Delivery in accordance with the provisions of the	Environment	We are happy to include this

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
	Policy Area – Policy TTV28.5	Community Right to Build Order (CRtBO), including appropriate flood risk mitigation measures (including improvements to the leat to protect existing development downstream), remediation of contaminated land and habitat enhancement.	Agency	modification which is consistent with the requirements of other policies of the plan and in any case provided for in the planning consent for the site.
M187	Strategy for TTV Policy Area – Policy TTV28.5	NEW POINT Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.	Historic England	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.
M188	Strategy for TTV Policy Area – Strategic Objective SO8	NEW POINT Conserving and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.	Historic England	The modifications are consistent with the historic environment policies of the plan.
M189	Strategy for TTV Policy Area – para 5.117	Bere Alston sits within the heart of the Bere 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.	Tamar Valley AONB	The modifications are considered to be helpful clarifications.
M190	Strategy for TTV Policy Area – new para after 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.	Historic England	The new paragraph seeks to reinforce the particular significance of the Dartington Estate, and does not affect the policy provisions for Dartington.
M191	Strategy for TTV Policy Area – new para after 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	Devon County Council	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

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		County Council.		and DELI.
M192	Strategy for TTV Policy Area – Policy TTV29.1	a. Layout, and design and location of structural landscaping to be guided by landscape assessment.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M193	Strategy for TTV Policy Area – Policy TTV29.2	a. Layout, and design and location of structural landscaping to be guided by landscape assessment.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M194	Strategy for TTV Policy Area – Policy TTV29.4 (replaces original points a and b)	a. A development scheme that is informed by an historic character assessment and masterplan to ensure a holistic and co-ordinated approach across the Dartington estate, including: i Extent, scale, design and materials appropriate in the heritage context. A design which demonstrates the high quality, innovative and exceptional standards with which the Estate is synonymous to ensure that the special architectural and historic qualities of the Estate are retained. ii Re-provision of adequate parking in a location that would not have an adverse impact on heritage assets. iii Retention of the undeveloped ‘open’ character of much of the land adjoining the site due to the positive contribution that this makes to the heritage assets and their settings. iv Appropriate boundary treatment in order to retain the rural character of the wider Estate landscape. v An archaeological assessment of the site to inform and guide the development proposals.	Historic England	Policy criteria restructured and re-ordered to provide greater clarity; additional detail added to the historic environment considerations as identified in the JLP’s Heritage Impact Assessment (HE4)
M195	Strategy for TTV Policy Area – Policy TTV29.5	a. A development scheme that is informed by an historic character assessment and masterplan to ensure a holistic and co-ordinated approach across the Dartington estate, including: i A design which demonstrates the high quality, innovative and exceptional standards with which the	Historic England	Policy criteria restructured and re-ordered to provide greater clarity; additional detail added to the historic environment considerations as identified in the JLP’s Heritage Impact Assessment (HE4)

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		<p>Estate is synonymous to ensure that the special architectural and historic qualities of the Estate are retained.</p> <p>ii Re-use of the former school building at Foxhole in order to help secure the viable long-term use of the Listed Buildings.</p> <p>iii Retention of the undeveloped 'open' character of much of the land adjoining the site due to the positive contribution that this makes to the heritage assets and their settings.</p> <p>iv Appropriate boundary treatment in order to retain the rural character of the wider Estate landscape.</p> <p>v An archaeological assessment of the site to inform and guide the development proposals.</p>		
M196	Strategy for TTV Policy Area – Policy TTV29.11	Mixed use - with homes and employment (Use Classes B1a, B2 and B8)	Kingswood Homes	The modification aligns the policy to the planning consent for the site.
M197	Strategy for TTV Policy Area – Policy TTV29.11	d. Community Allotments.	Kingswood Homes	The modification aligns the policy to the planning consent for the site.
M198	Strategy for TTV Policy Area – Policy TTV29.11	NEW POINT Contributions to expanding primary school capacity in the area.	Devon County Council	The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.
M199	Strategy for TTV Policy Area – Policy TTV29.12	NEW POINT Contributions to expanding primary school capacity in the area.	Devon County Council	The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.
M200	Strategy for TTV Policy Area – Policy TTV29.13	NEW POINT Contributions to expanding primary school capacity in the area.	Devon County Council	The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.
M201	Strategy for TTV Policy Area – Policy TTV29.15	NEW POINT Strategic landscaping and open space to the north and east of the site, linked to the open space to the north east of the site at West Barracks Road.	Natural England	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

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
				plan.
M202	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M203	Strategy for TTV Policy Area – Policy TTV29.18	NEW POINT Contributions to expanding primary school capacity in the area.	Devon County Council	The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.
M204	Strategy for TTV Policy Area – Policy TTV29.19	NEW POINT Strategic landscaping bordering the site.	Natural England	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.
M205	Strategy for TTV Policy Area – Policy 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.	Natural England	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.
M206	Strategy for TTV Policy Area – Policy TTV29.19	NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.	Natural England	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 and legal requirements.
M207	Strategy for TTV Policy Area – Policy 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..	Historic England Natural England	Although it is not strictly necessary we are happy to accommodate these wording changes as requested
M208	Strategy for TTV Policy Area – Policy TTV29.20	NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.	Natural England	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 and legal requirements.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
M209	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M210	Strategy for TTV Policy Area – Policy TTV29.21	NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.	Natural England	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 and legal requirements.
M211	Strategy for TTV Policy Area – Policy TTV29.21	NEW POINT Careful consideration of extent, scale and appearance of development to minimise local landscape impacts.	Natural England	We are happy to accommodate this minor modification which is consistent with policies of the plan relating to landscape impacts.
M212	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M213	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M214	Strategy for TTV Policy Area – Policy 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M215	Strategy for TTV Policy Area – Policy	a. Recognising and enhancing the relationship with the South Devon AONB, with careful consideration of	Natural England	Although it is not strictly necessary we are happy to accommodate this

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
	TTV29.25	scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts.		wording change as requested.
M216	Strategy for TTV Policy Area – Strategic Objective SO9	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. This will be achieved through:	V Tanner-Tremaine	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)
M217	Strategy for TTV Policy Area – Strategic Objective SO9	NEW POINT Protecting and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.	Historic England	Although it is not strictly necessary we are happy to accommodate this wording change
M218	Strategy for TTV Policy Area – para 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.	Dartington Hall Trust	The modifications are considered to be helpful clarifications.
M219	Strategy for TTV Policy Area – para 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 forward through neighbourhood plans (the South Hams & West Devon	South Devon AONB Thurlestone Parish Neighbourhood Plan Rattery Parish Council Blue Cedar Homes	The modifications are considered to be helpful clarifications.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		Village Sustainability Assessment Framework', Feb 2017). This assessment is based upon factors such as the level of services and facilities available in each settlement ...		
M220	Strategy for TTV Policy Area – para 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. ...	South Devon AONB Thurlestone Parish Neighbourhood Plan Rattery Parish Council	The modifications are considered to be helpful clarifications.
M221	Strategy for TTV Policy Area – Fig 5.8	Villages able to accommodate around 20 dwellings each : Berry Pomeroy, Ermington , Halwell ... Villages able to accommodate around 10 dwellings each: Ashprington, ..., Bigbury , ... Wrangaton Grenofen ..., Sydenham Damerell	Bigbury Parish Council E Huntley Stuart Properties D Blackburn	In respect of Ermington, the village was included in the list of Sustainable Villages set out in para 5.10 of 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,

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				we agree that these are justified by the evidence base.
M222	Strategy for TTV Policy Area – new para to follow para 5.160	The countryside includes all land that falls outside 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.	Mack-Plan Neighbourhood Planning Team	The modifications are considered to be helpful clarifications.
M223	Strategy for TTV Policy Area – Strategic Objective 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.	V Tanner-Tremaine South Devon AONB	The modifications are considered to be helpful and consistent with the spatial strategy and development policies of the plan.
M224	Strategy for TTV Policy Area – Policy TTV31	The LPAs will protect the special characteristics and role of the countryside. The following provisions will apply to the consideration of development proposals in the countryside:	V Tanner-Tremaine	This minor change is to provide more precision in the policy.
M225	Strategy for TTV Policy Area – Policy 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.	Historic England	This modification is consistent with the positive strategy for the historic environment set out in the plan.
M226	Strategy for TTV Policy Area – Policy TTV31	POINT 3 – HORSE RELATED DEVELOPMENT. THE PROPOSAL IS TO MOVE THIS TEXT UNCHANGED INTO A SEPARATE POLICY	South Devon AONB	This modification seems a logical clarification.
M227	Strategy for TTV Policy Area – Policy 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.	RSPB	The modification is considered to be helpful clarification.
M228	Strategy for TTV Policy Area – New Policy to replace TTV31.3 (changes to	THE POLICY WORDING PROPOSED WILL BE IDENTICAL TO THAT IN TTV31.3	South Devon AONB	This modification seems a logical clarification.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
	original highlighted)			
M229	Strategy for TTV Policy Area – Policy TTV32	NEW POINT The extension is appropriate in scale and design in the context of the setting of the host dwelling, and should lead to an enhancement of the overall site within that context.	Tamar Valley AONB South Devon AONB Thurlestone Parish Neighbourhood Plan S Blakeman	The modification addresses an accidental omission in the original policy wording and is consistent with the plan's positive approach to design in the countryside.
M230	Strategy for TTV Policy Area – new para after para 5.166	Further design guidance on the implementation of Policy TTV32 will be included in the Thriving Towns and Villages SPD.	Tamar Valley AONB South Devon AONB Thurlestone Parish Neighbourhood Plan S Blakeman	The modification is considered to be helpful clarification.
M231	Development Policies – Strategic Objective SO11	To deliver development which is sustainable and of the right type for its location and of good quality, which:	V Tanner-Tremaine	The modification is considered to be helpful clarification.
M232	Development Policies – Policy DEVI	1. Ensuring that new development provides for satisfactory daylight, sunlight, outlook, privacy and the protection from noise disturbance for both new and existing homes and for other appropriate uses. Unacceptable impacts will be judged against the level of amenity generally in the locality.	G Davidson J Kershaw (SHDC)	The modification is considered to be helpful clarification.
M233	Development Policies – Policy DEV2	2. Where located in an Air Quality Management Area, avoid or mitigate its impact through positively contributing towards the implementation of measures contained within air quality action plans and transport programmes, and through building design and layout which helps minimise air quality impacts.	J Kershaw (SHDC)	The modification is considered to be helpful clarification.
M234	Development Policies	1.Supporting the creation of new or enhancing	Sport England	The modification is considered to be

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	– Policy DEV3	existing sports facilities where a need has been identified, including bringing private and education related sports facilities into wider community use.		helpful clarification about one potential supply source for sports facilities.
M235	Development Policies – 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.	Sport England	This part of DEV4 is seen as unnecessary duplication and over-elaboration of the provisions of DEV3
M236	Development Policies – 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.	J Graham M Lawrence Cllr K Baldry V Scott Kingsbridge Town Council W Pascoe J Gibbs Bovis Homes Blue Cedar Homes Premier Marinas LVA	The modifications address an inconsistency with Policy DEV7
M237	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.	J Graham M Lawrence Cllr K Baldry V Scott Kingsbridge Town Council	The modifications address an inconsistency with Policy DEV7

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
			W Pascoe J Gibbs Bovis Homes Blue Cedar Homes Premier Marinas LVA	
M238	Development Policies – 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 .	J Graham M Lawrence Cllr K Baldry V Scott Kingsbridge Town Council W Pascoe J Gibbs Bovis Homes Blue Cedar Homes Premier Marinas LVA	The modifications address an inconsistency with Policy DEV7
M239	Development Policies – 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.	Environment Agency	The additional elements of this point are consistent with what would be required to meet other policies of the plan, but it is helpful clarification to include them specifically here.
M240	Development Policies – 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.	Environment Agency	The modification is considered to be helpful clarification.
M241	Development Policies – 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 .	South Devon AONB	The modification adds clarity to evidence that will be needed in the context of wider policies to safeguard the environment.
M242	Development Policies – Policy DEV15	Business start-ups, home working, small scale employment and the development and expansion of	South Devon AONB	The modification is considered to be helpful clarification.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		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.		
M243	Development Policies – 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.	South Devon AONB	The modification is considered to be helpful clarification.
M244	Development Policies – Policy DEV20	1. Creating a positive legacy of decisions high quality development through consideration that has been given to by 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 . Larger scale development should seek to address Building for Life criteria or a similar design framework.	Tamar Valley AONB	The modification is considered to be helpful clarification.
M245	Development Policies – 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.	Tamar Valley AONB	The modification is considered to be helpful clarification.
M246	Development Policies – Policy DEV20	4. Delivering building design that is distinctive to the place where it is located locally distinctive design.	Tamar Valley AONB	The modification is considered to be helpful clarification.
M247	Development Policies – Policy DEV21	Conserving Strategic approach to the historic environment	Historic England	The revised title is a helpful clarification of the role of the policy.
M248	Development Policies – Policy DEV21	The LPAs will pursue a proactive and solution-orientated approach for the conservation and	Historic England Devon County	The policy has helpfully been simplified with unnecessary text removed.

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		<p>enjoyment 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, by: Protecting and enhancing the character and special interest of heritage assets and their setting, including: 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). 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.</p> <p>In particular they will supporting proposals for heritage-led regeneration and working with developers and investors to 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.</p>	Council	
M249	Development Policies – Policy DEV22	<p>Development proposals will need to sustain the local character and distinctiveness of the area and, by conserving or and where appropriate enhancing its historic environment, both designated and non-designated heritage assets and their settings, according to their national and local significance. The following provisions will apply:</p>	Historic England V Tanner-Tremaine	The modifications are considered to be helpful clarifications, reflecting more precisely NPPF wording.
M250	Development Policies – Policy DEV22	<p>1. Development should conserve or enhance the historic environment, including designated heritage assets of national importance and undesignated heritage assets of local significance and their settings.</p>	Historic England	Unnecessary / repetitive text removed.

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M251	Development Policies – Policy DEV22	2. The significance, character, setting and local distinctiveness of heritage assets should be considered within an appropriate assessment to determine impact. this significance. In certain cases applicants will be required to arrange archaeological or historic asset assessment and evaluations.	Historic England	Unnecessary / repetitive text removed.
M252	Development Policies – Policy DEV22	3. Great weight will be given to the conservation of the Plan Area's heritage assets. Where development proposals will lead to substantial any harm to, or loss of the significance of a designated heritage asset, permission will be refused they must be fully justified against wider public benefit. Exceptions to this will only be made where the harm to such elements is outweighed by the public benefits of the proposal, with substantial harm or total loss to the significance of a designated heritage asset (or archaeological site of national importance) only permitted in exceptional circumstances. Where this harm can be justified applicants will be required to undertake excavation or recording as appropriate, followed by analysis and publication to professionally acceptable standards.	Historic England	The modifications are considered to be helpful clarifications, reflecting more precisely NPPF wording.
M253	Development Policies – Policy DEV22	4. Adverse impacts on locally important heritage assets and/or their settings should be avoided. Where proposals are likely to cause substantial harm to or loss of locally important assets, permission will only be granted where the public benefit outweighs the asset's historic or archaeological interest, having regard to the scale of any harm or loss and the significance of the heritage asset. The features of interest should be preserved in situ, but where this is not justifiable or feasible, provision must be made for appropriate preservation by record. Supporting proposals which conserve the Plan Area's locally important non-designated heritage assets. Development that harms the	Historic England	The modifications are considered to be helpful clarifications, reflecting more precisely NPPF wording. Unnecessary / repetitive text removed.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		significance of such assets, or their contribution to the character of a place will only be permitted where it can be justified. Proposals will be weighed against the public benefits.		
M254	Development Policies – Policy DEV22	5. Development should help secure the long term sustainable future for the Plan Area's heritage assets, especially those identified as being of greater risk of loss and decay and that might have a community benefit where possible.	Historic England	The modification is considered to be a helpful clarification.
M255	Development Policies – Policy DEV22	6. Development should respond positively and creatively to ensure those elements that contribute to the special character and appearance of conservation areas are preserved or enhanced using, where appropriate, Conservation Area Appraisals and Management Plans to inform future development.	Historic England	The modification is considered to be a helpful clarification.
M256	Development Policies – Policy DEV23	1. The historical and social importance cultural significance of the seven key attributes that express the OUV of the Site as well as other of key buildings or other features and their contextual setting as may contribute to this significance.	Tamar Valley AONB	The modification is considered to be a helpful clarification.
M257	Development Policies – Policy DEV23	2. The need to conserve and maintain existing historic fabric and to retain and reflect locally distinctive features in the design of buildings, layouts and landscape to ensure the authenticity and integrity of the World Heritage Site is maintained.	Tamar Valley AONB	The modification is considered to be a helpful clarification.
M258	Development Policies – Policy DEV23	3. The integrity and authenticity of industrial infrastructure, transportation networks and associated features.	Tamar Valley AONB	The modification is considered to be a helpful clarification.
M259	Development Policies – Policy DEV23	5. The need to be in accordance with the principles and objectives of the relevant Cornwall and West Devon Mining Landscape WHS Management Plan and other guidance/ adopted documents.	n/a	Tidy up of policy in context.
M260	Development Policies	NEW PROVISION Proposals that would result in harm	Tamar Valley	The modification is helpful in clarifying

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
	– Policy DEV23	to the authenticity and integrity of the Outstanding Universal Value, should be wholly exceptional. Less than substantial harm must be justified. Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal and whether it has been demonstrated that all reasonable efforts have been made to mitigate the extent of the harm. If the impact of the proposal is neutral, either on the significance or setting, then opportunities to enhance or better reveal the significance should be taken.	AONB	how proposals that would cause harm would be considered in accordance with national policy.
M261	Development Policies – Policy DEV23	NEW PROVISION All development proposals should be informed by proportionate historic environment assessments and evaluations. These will identify the significance of all heritage assets that would be affected by the proposals, the nature and degree of any effects and demonstrate how any harm will be avoided, minimised or mitigated.	Tamar Valley AONB	The modification is helpful in clarifying the evidence that developments in the WHS should provide.
M262	Development Policies – para. 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	Tamar Valley AONB	The modification is considered to be a helpful clarification and update.
M263	Development Policies	2. Conserve and enhance the characteristics and views	Environment	The modification is considered to be a

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
	– Policy DEV24	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.	Agency	helpful clarification.
M264	Development Policies – Policy DEV24	6. Where necessary, be supported by Landscape and Visual Impact Assessments and landscaping schemes that enhance that proposed development.	South Devon AONB	The modification is considered to be a helpful clarification.
M265	Development Policies – para. 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.	South Devon AONB	The modification is considered to be a helpful clarification.
M266	Development Policies – Policy DEV25	4. Is consistent with policy statements for the local policy unit in the current Shoreline Management Plan 2.	Natural England V Tanner-Tremaine	This is a helpful suggestion to future proof the policy.
M267	Development Policies – Policy DEV25	NEW POINT Is consistent with the relevant Heritage Coast objectives, as contained within the relevant AONB Management Plan.	South Devon AONB V Tanner-Tremaine	We are happy to support the inclusion of this new point as it reflects what is already intended.
M268	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 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	South Devon AONB	The modification is considered to be a helpful clarification.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		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.		
M269	Development Policies – Policy DEV27	The highest degree of protection will be given to 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:	South Devon AONB V Tanner-Tremaine	The modification is considered to be a helpful clarification.
M270	Development Policies – 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.	V Tanner-Tremaine	The modification is considered to be a helpful clarification.
M271	Development Policies – Policy DEV27	6. Seek opportunities to enhance and restore protected landscapes by addressing areas of 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.	South Devon AONB V Tanner-Tremaine	The modification is considered to be a helpful clarification.
M272	Development Policies – Policy DEV27	8. Require development proposals located within or within the setting of the AONB a protected landscape to:	South Devon AONB V Tanner-Tremaine	The modification is considered to be a helpful clarification.
M273	Development Policies – Policy DEV27	8 i Conserve and enhance the natural beauty of the area protected landscape with particular reference to their special qualities and distinctive characteristics or valued attributes.	South Devon AONB V Tanner-Tremaine	The modification is considered to be a helpful clarification.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
M274	Development Policies – Policy DEV27	8 vii Retain links, where appropriate, with the distinctive historic and cultural heritage features of the area protected landscape .	South Devon AONB V Tanner-Tremaine	The modification is considered to be a helpful clarification.
M275	Development Policies – 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:	Natural England	This minor change is to more precisely reflect NPPF wording.
M276	Development Policies – Policy DEV28	1 Full account will be given in making planning decisions to the importance of any affected habitats and features, taking account of the hierarchy of protected sites:	Natural England	The policy structure has been simplified in the context of a modified structure for SPT11, to avoid repetition.
M277	Development Policies – Policy DEV28	AMENDED 1 i The highest level of protection will be given to European Sites. Internationally important sites including existing, candidate or proposed Special Protection Areas and Special Areas of Conservation. Development will not be permitted unless it will not adversely affect the integrity of a European site either alone or in combination with other development. Proposals having a harmful impact on the integrity of European Sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where: i There are no suitable alternatives. ii There are Imperative Reasons of Overriding Public Interest. iii Necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European Sites is protected.	Natural England S Devon AONB V Tanner-Tremaine Dartington Hall Trust	The modification incorporates elements that are in the submission version of SPT11 and also moves some provisions to SPT11. Additionally it moves provisions from DEV28.3 into this modified point, and more precisely reflects NPPF wording.
M278	Development Policies – Policy DEV28	AMENDED 1 ii A high level of protection will be given to sites of national significance for nature conservation. Nationally important sites including Sites of Special Scientific Interest, National Nature Reserves, Ancient Woodlands and Marine Conservation Zones.	Natural England S Devon AONB V Tanner-Tremaine Dartington Hall Trust	The modification incorporates elements that are in the submission version of SPT11 and also moves some provisions to SPT11. Additionally it moves provisions from DEV28.3 into this

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		Development proposed on land within or outside such a site which would be likely to have a harmful impact on the site (either individually or in combination with other developments) will not be permitted unless the benefits of the development, at the site, clearly outweigh both the impacts on the notified special interest features of the site and any broader impacts on the national network of sites of national significance for nature conservation.		modified point, and more precisely reflects NPPF wording.
M279	Development Policies – Policy DEV28	AMENDED 1 iii. Development likely to have a harmful impact on locally important designated sites, their features or their function as part of the ecological network, including County Wildlife Sites, Local Nature Reserves, Regionally Important Geological Sites, County Geological Sites and other priority habitats will only be permitted where the need and benefits of the development clearly outweigh the loss and where the coherence of the local ecological network is maintained.	Natural England S Devon AONB V Tanner-Tremaine Dartington Hall Trust	The modification incorporates elements that are in the submission version of SPT11 and also moves some provisions to SPT11. Additionally it moves provisions from DEV28.3 into this modified point, and more precisely reflects NPPF wording.
M280	Development Policies – Policy DEV28	NEW POINT 4. Harmful impacts on European and UK protected species and Biodiversity Action Plan habitats and species must be avoided wherever possible, subject to the legal tests afforded to them where applicable, and unless the need for, or benefits of the development clearly outweigh the loss.	Natural England S Devon AONB V Tanner-Tremaine Dartington Hall Trust	The modification moves provisions from DEV28.3 into this modified point, and more precisely reflects NPPF wording.
M281	Development Policies – Policy DEV28	4 iv. The ecological network of wildlife corridors and stepping stones that link the biodiversity areas detailed above, including areas identified for habitat restoration and creation.	Natural England S Devon AONB V Tanner-Tremaine Dartington Hall Trust	The provision has been incorporated in modified form in SPT11, avoiding duplication.
M282	Development Policies – Policy DEV28	3. Development which would be likely to directly or indirectly impact the biodiversity value of a site will not be permitted unless: i. The need for and the public interest benefits of the	Natural England S Devon AONB V Tanner-Tremaine Dartington Hall	These provisions have been moved to other parts of DEV28 as part of the modified structure of the policy.

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		<p>development outweigh the harm, including any harm to the integrity of the ecological network.</p> <p>ii. The impacts cannot be avoided through an alternative, less harmful location, design or form of development.</p> <p>iii. The development demonstrates that it has proactively tried to avoid impacts on biodiversity and geological interests through the design process prior to developing measures to mitigate or as a last resort to compensate for unavoidable impacts.</p> <p>iv. The favourable conservation status of legally protected species is maintained.</p> <p>v. Impacts upon species, habitats or geodiversity can be reduced to a level whereby they are not significant by appropriate mitigation or as a last resort, by compensation.</p> <p>vi. Potentially adverse effects can be fully mitigated and/or compensated in the case of European Protected Sites.</p>	Trust	
M283	Development Policies – new para. after para. 6.97	<p>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.</p>	Environment Agency	The text provides potentially helpful information which we are happy to include.
M284	Development Policies – Policy DEV29	<p>1. Development that would result in an 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.</p>	n/a	Correction of an error, as the plan recognises that LGSs can also be promoted through neighbourhood plans.
M285	Development Policies	<p>4. Where development is proposed in an area where</p>	House Builders	The modification is considered to be a

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	– Policy DEV29	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.	Federation	helpful clarification.
M286	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.	Environment Agency	The text provides information about a water management function of green space which we are happy to include.
M287	Development Policies – Policy DEV30	... important hedgerows including Devon hedgebanks and hedgerow trees; or orchards	South Devon AONB Friends of Dartmouth Community Orchard	The modification is considered to be a helpful clarification.
M288	Development Policies – 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:	Historic England	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
M289	Development Policies – 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.	South Devon AONB Tamar Valley AONB	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
M290	Development Policies – 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	Devon County Council	The modification is considered to be a helpful clarification.

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		provisions of Policy W4 of the Devon Waste Plan will apply to the South Hams and West Devon administrative areas.		
M291	Development Policies – Policy DEV33	5 i There is a need for the facility and that there are no other appropriate and more suitable facilities for waste management in a reasonable proximity.	Devon County Council	The modification is made to provide consistency with national policy.
M292	Development Policies – 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.	Devon County Council	The modification is considered to be a helpful clarification.
M293	Development Policies – 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 decentralised energy. The following provisions apply:	Plymouth Energy Community Two Valleys Community Energy SW Devon Community Energy Partnership	The modifications apply a local target which is considered more appropriate for the plan and improve consistency with the NPPF.
M294	Development Policies – 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.	Warm and Low Energy Building Practice	The modification is considered to be a helpful clarification.
M295	Development Policies – para 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,	Plymouth Energy Community Two Valleys Community Energy SW Devon	The modification is a consequential change of the proposed modification to DEV34

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		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 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.	Community Energy Partnership	
M296	Development Policies – para 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.	Plymouth Energy Community	The modification is a consequential change of the proposed modification to DEV34
M297	Development Policies – 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 designated and undesignated 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.	Devon County Council S Duncan Dr P Bratby D Morgans B Perks B Watkin L Osborne C Murray Harbeton Parish Council S Morley D Smith N McDonnell	The modification is considered to be a helpful clarification.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
			M Marshall S Lucas Dr R Porkess M Hewett P Davidson G Davidson S Wolstenholme South Devon AONB	
M298	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.	N McDonnell M Marshall	The modification is considered to be a helpful clarification.
M299	Development Policies – 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.	S Morley N McDonnell Dr R Porkess	The modification is considered to be a helpful clarification.
M300	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.	D Morgans	We agree that this is an unnecessary restriction that can be removed.
M301	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:	Environment Agency	Although it is not strictly necessary we are happy to accommodate this wording change as requested
M302	Development Policies – Policy DEV37	NEW SUB POINT UNDER POINT 3 Ensure the safety of people in consultation with emergency planning services.	Environment Agency	We are happy to include this modification as requested.
M303	Development Policies – 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	Environment Agency	The modification is considered to be a helpful clarification and simplification of the policy.

Ref	Part of JLP (Submission version) affected	Potential modification	Representations	Why the modification is being put forward
		<p>hierarchies set out in the Plymouth and Devon Local Flood Risk Management Strategies.</p> <ul style="list-style-type: none"> i. Discharge to a waterbody (if available and with sufficient capacity). ii. Infiltration. iii. Discharge to a waterbody (if available and with sufficient capacity). iv. Discharge to a surface water sewer, highway drain or culverted watercourse with attenuation as required. v. In exceptional circumstances, discharge to a combined sewer. 		
M304	Development Policies – 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.	Natural England	The modification is considered to be a helpful clarification.
M305	Development Policies – para 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 turn can have impacts on the water quality, especially bathing waters. Development should incorporate water efficient design principles, ...	Environment Agency	The modifications are considered to be helpful clarifications.
M306	Development Policies – new para after para	Plymouth City Council’s Local Flood Risk Management Strategy sets out a drainage hierarchy which differs from	Environment Agency	The modifications are considered to be helpful clarifications consequential to

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	6.137	<p>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 easier to adopt and maintain in an urban area.</p>		the proposed modifications of DEV37.
M307	Development Policies – new para after para 6.138	<p>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 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.</p>	Environment Agency	The text provides potentially helpful information which we are happy to include.

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M308	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.	V Tanner-Tremaine	The modification is considered to be a helpful clarification.
M309	Delivery and Monitoring – 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.	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
M310	Annex 2 – Plan Targets and Direction of Travel Indicators	114 Water body classification and bathing water quality.	Environment Agency	We are happy to amended 114 to accommodate this request.
M311	Annex 2 – spatial strategy measures of success	See M27	Natural England	Although it is not strictly necessary we are happy to accommodate this wording change
M312	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 in harmony with nature for the benefit of all.	UK Committee for UNESCO MaB Programme	We are happy to include this new item.
M313	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.	Natural England	This is a helpful addition.
M314	Glossary	Natural Infrastructure: For a definition see 'Green	Natural England	This is a helpful addition.

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		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'.		
M315	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.	n/a	Updated description.
M316	Glossary	Priority Habitats – Those identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)	Environment Agency Natural England	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.
M317	Map I	Removal of all proposed Marine Conservation Zones as they have no status. These are Erme Estuary, Devon Avon Estuary and Dart Estuary.	Natural England	This is a correction to the Map.
M318	Policies Map – Plymouth Policy Area Map 3 – Plymouth Green Space	Reduction of boundary of local green space allocation at Petersfield Close/Efford Crematorium	A Cottenham	Correction of error which we had intended to correct before Submission
M319	Policies Map – Plymouth Policy Area	Coastal Change Management Area has been put on the Policies Map for South Hams but has been missed from the Policies Map for the Plymouth Policy Area	n/a	Correction of an error which was identified after submission.