

PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN - SCHEDULE OF ADDITIONAL MODIFICATIONS

INTRODUCTION

The following Additional Modifications were consulted on alongside the Main Modifications on the Plymouth and South West Devon Joint Local Plan from Monday 22 October 2018 to Monday 3 December 2018.

They adopt the conventional form of strikethrough (strikethrough) for deletions and underlining and bold (**underlining and bold**) for additions to Policy and text. The schedule indicates the relevant policy, paragraph or table numbers from the Submission version of the JLP with sufficient text for the Modification to be read in context. The reasons for the modification are set out in the final column. A Modification reference number (AMXX) is included for reference.

Ref	Part of JLP (Submission version) affected	Additional modification	Reason
AM1	Introduction - new para after para 1.18.	<u>In addition to the JLP the LPAs will prepare supplementary planning documents (SPDs) for both the Plymouth Policy Area and the Thriving Towns and Villages Policy Area. These SPDs will build upon and provide more detailed advice or guidance on the policies in the JLP where appropriate.</u>	It merely includes in introduction a commitment to prepare these SPDs that exists in several other places in the plan. The wording proposed reflects the guidance set out in NPPG para Paragraph: 028 Reference ID: 12-028-20140306
AM2	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 <u>and the village networks they serve.</u>	The modification merely clarifies what is self-evident in the way the spatial strategy is designed to work, that villages support one another through village networks (e.g. see paras 3.10 and 5.153)
AM3	Vision – ‘Strategic Objectives of Plan’ box	10. Maintaining a <u>naturally</u> beautiful and thriving countryside: To <u>protect, conserve</u> preserve and enhance the natural beauty of South West Devon's countryside, and to avoid the creation of new homes <u>development</u> in unsustainable locations.	The modification is considered to be helpful and consistent with the spatial strategy and development policies of the plan. – in particular SO1, TTV31 and DEV24-27.
AM4	Vision – ‘Strategic Objectives of Plan’ box	11. Delivering high quality development: To deliver development which is sustainable and of the right type <u>for its location</u> and <u>of good</u> quality.	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM5	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 <u>and</u>	Although not strictly necessary, the modification is considered to provide helpful clarification.

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		South West Devon , and the inter-relationships between the main towns, villages and rural areas of South West Devon. These spatial levels ...	
AM6	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.	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM7	Spatial Strategy – fig 3.2	Change TTV Accessible Natural Space standard to: 1.91ha. per 1000	This is a correction of the application of the evidence base to fig 3.6
AM8	Spatial Strategy – fig 3.2	Change TTV Playing Pitch standard to: 1.27ha. per 1000	This is a correction of the application of the evidence base to fig 3.6
AM9	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.	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM10	Spatial Strategy – new para after para 3.57	Additionally, the LPAs will cooperate with the Tamar Valley and South Devon AONB Partnerships in the implementation of the plan's policies for conserving the landscape and scenic beauty of the AONBs. Furthermore, 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.	The additional narrative has been requested through the consultation process and is a statement of fact.
AM11	Spatial Strategy – Policy SPT8	3iv. Supporting improvements to local rail connectivity and links between Tavistock and Plymouth and Okehampton and Exeter.	This minor text change clarifies the context for this part of the policy.
AM12	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 ...	This minor text change is an update.
AM13	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 ...	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM14	Spatial Strategy – Policy SPT9	The LPAs and the local highway authorities of Plymouth and Devon, working with key transport stakeholders, will deliver an integrated approach to	Removal of unnecessary words to help clarify the policy.

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		transport and planning, delivering a strategic approach to transport based upon the following key principles. ...	
AM15	Spatial Strategy – Policy SPT9	1. Sustainable growth as a key driver behind the transport strategy within Plymouth , whilst making sure that transport is delivered in the most health promoting and environmentally responsible manner.	Although we don't consider that any change is necessary for soundness, the modification responds to a discussion at the hearings. Devon County Council have confirmed they are happy with the modification proposed.
AM16	Spatial Strategy – para 3.74 (SPT9)	<u>The policy recognises that local communities are well placed to identify transport issues and solutions for their area. One way this can be done is through neighbourhood plans.</u> The framework established by the policy seeks to <u>guide local communities in identification and promotion of appropriate sustainable transport options for their communities.</u> It also seeks to ensure that development takes place in the most sustainable and efficient locations in relation to supporting sustainable transport choices, and delivers balanced growth that minimises the need to travel by providing easy access to community amenities, leisure opportunities and our high quality natural environment by sustainable transport.	The additional text is not necessary for soundness reasons but responds to a discussion at the hearing about the possible role of neighbourhood plans in supporting Policy SPT9, consistent with point 10 of the policy.
AM17	Spatial Strategy – para 3.83	... A healthy natural environment is also an important part of enhancing the health and wellbeing of communities, <u>and plays an important role in protecting water quality and managing flood risk.</u>	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM18	Spatial Strategy – para 3.90	... These designations and policy protections include <u>the Tamar Valley and South Devon</u> Areas of Outstanding Natural Beauty (AONBs) and <u>Dartmoor</u> National Parks 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. <u>In respect of the National Park, although the park lies entirely outside of the boundary of the Plan Area, it is important that decisions taken within the Plan Area take account of its special status.</u>	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM19	Spatial Strategy – Policy SPT12	The LPAs will work in partnership with key funding partners and investors in order to ensure that the infrastructure needed to deliver the spatial strategy is prioritised <u>delivered.</u>	Minor modification agreed as part of Statement of Common Ground negotiations. The modification does not change the context of the policy.

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AM20	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.	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Natural England.
AM21	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.	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Natural England.
AM22	Spatial Strategy – box after para. 3.105 (and consequential change in Annex 2)	E. The area's stunning setting, maritime heritage, quality environment and natural assets continue to be protected and harnessed enhanced .	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Natural England.
AM23	Strategy for Plymouth Policy Area – Policy PLY4	... Where Ministry of Defence land is surplus to the strategic defence requirement, priority will be sought for uses which help to deliver the plan's economic growth objectives and ...	The modification does not change the context of the policy.
AM24	Strategy for Plymouth Policy Area – Policy PLY7	Para 4.47 ... pedestrians and cyclists. Retention of the Art Deco Colin Campbell House will be sought, with demolition only considered where there is no reasonable alternative.	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM25	Strategy for Plymouth Policy Area – Policy PLY8	NEW POINT Conserving and enhancing the significance and settings of designated and non-designated heritage assets along Royal Parade.	The significance of these assets would have in any case been conserved or enhanced in accordance with Policy PLY8.1, DEV21 and DEV22.
AM26	Strategy for Plymouth Policy Area – Policy PLY10	2. Buildings of between 5-6 storeys in height, with with 6-8 storeys along Armada Way frontage , to reinforce the primacy of this principal thoroughfare from Plymouth Railway Station to the Hoe.	The modification is considered to provide helpful clarification and provide some amplification of the purpose behind the building heights provision.
AM27	Strategy for Plymouth Policy Area – Policy PLY12	1. Recognition of the high heritage and architectural value of the buildings and the protection and enhancement of these in any partial demolitions and external alterations.	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM28	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.	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM29	Strategy for Plymouth	Land at The Crescent, Derry's Cross is allocated for mixed use development	This is the correction of an error that occurred at

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	Policy Area –Policy PLY14	which could support a range of uses including small scale retail, leisure, a quality hotel, offices and a range of substantial quantity of high quality housing. Provision is made for in the order of 120 homes.	drafting stage; the text to be deleted is unrelated to the policy.
AM30	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.	Although not strictly necessary, the modification is considered to provide helpful clarification.
AM31	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. ...	The modification adds some flexibility around delivery without impacting on its core purpose.
AM32	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.	The modification is considered to provide helpful clarification, and would be required in any case through the implementation of Policy DEV37.
AM33	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 develop suitable strategies for the management of coastal flood risk. Developments will be expected to contribute to the costs of new and improved defences.	This modification simply provides a statement of intent on behalf of the Councils with no impact on the policy.
AM34	Strategy for Plymouth Policy Area – Policy PLY23	4. Protects the opportunity for a high quality tall building on the axis of Barbican Approach and Lockyer's Quay, relating to a major new waterfront public square and acting as a positive, memorable and widely visible landmark for the Sutton Harbour East area, Coxside.	This modification addresses an error in the original drafting.
AM35	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.	These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm

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			this to be that case.
AM36	Strategy for Plymouth Policy Area – Policy PLY24	<u>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.</u>	These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm this to be that case.
AM37	Strategy for Plymouth Policy Area – Policy PLY25	<u>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.</u>	These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm this to be that case.
AM38	Strategy for Plymouth Policy Area – Policy PLY26	Land at Fish Quay, Sutton Harbour is allocated for the enhancement of the existing fish quay and market, with complementary small-scale retail, education and leisure related uses.	Given the provisions of Policy DEVI6, especially points 3i and 5, as well as the requirements of Policy PLY26 for all development to support or be complementary to the primary function if the site for the fishing industry, the words ‘small scale’ are unnecessary duplication.
AM39	Strategy for Plymouth Policy Area – Policy PLY26	<u>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.</u>	These requirements would have come from the implementation of Policy DEV37 and DEV20.1, but we are happy to amplify the site specific policy to confirm this to be that case.
AM40	Strategy for Plymouth Policy Area – Policy PLY29	<u>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.</u>	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.
AM41	Strategy for Plymouth Policy Area – Policy PLY30	<u>NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.</u>	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.
AM42	Strategy for Plymouth Policy Area – Policy PLY31	<u>NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.</u>	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.
AM43	Strategy for Plymouth Policy Area – Policy	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	The new wording moves wording that was previously in point 11 of the policy, enabling consequential

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	PLY32	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.	deletions in the front end of the policy. There is no new content.
AM44	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 .	Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.
AM45	Strategy for Plymouth Policy Area – Policy PLY32	5. Retention of key infrastructure on the site relating to the management of Plymouth's waters, and the safeguarding of the waterfront from coastal flooding. NEW POINT Measures to ensure the improvement of surface water management to protect Plymouth's waters and the safeguarding of the waterfront from coastal flooding.	The change separates the infrastructure element of the provision from the flooding provision; the only new content is a reference to surface water management which in any case would be required by DEV37.
AM46	Strategy for Plymouth Policy Area – Policy PLY32	6. Retention of the small harbour and the site's slipways and marine recreational facilities.	Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.
AM47	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.	The modifications are considered to be helpful clarifications.
AM48	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.	Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.
AM49	Strategy for Plymouth Policy Area – Policy PLY32	10. Public art and other A ppropriate measures to celebrate the military heritage of the site.	Although it is not strictly necessary we are happy to accommodate this wording change requested by MoD/DIO.
AM50	Strategy for Plymouth Policy Area – Policy PLY32	11. Appropriate local facilities to support the new and existing residents and to enhance the sustainability of the existing area.	These provisions would be moved to front end of policy (see other modifications identified for this policy)
AM51	Strategy for Plymouth	12. Delivery of an access strategy to ensure that the transport impacts of the	Although it is not strictly necessary, we are happy to

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	Policy Area – Policy PLY32	development are appropriately managed and mitigated. , having regard also to the operation of the port.	accommodate the deletion of this text as requested by MoD/DIO which can be removed without affecting the substance of the provision.
AM52	Strategy for Plymouth Policy Area – Policy PLY32	13. <u>A good quality pedestrian and cycling access route, to and as close to the waterfront perimeter of the site as practicable,</u> along the site's whole waterfront through Millbay Port, and around the coast to Devil's Point, as part of linking to and enabling the extension of the South West Coast Path and National Cycle Network Route 27.	The simplification of text can be accommodated without affecting the substance of the provision.
AM53	Strategy for Plymouth Policy Area – Policy PLY33	<u>NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.</u>	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.
AM54	Strategy for Plymouth Policy Area – Policy PLY34	<u>NEW POINT Safeguarding of development and people from coastal flooding.</u>	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.
AM55	Strategy for Plymouth Policy Area – Policy PLY35	<u>NEW POINT Measures to ensure the improvement of surface water management, in accordance with the Local Flood Risk Management Strategy.</u>	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.
AM56	Policies PLY36, PLY46, PLY56, PLY58, PLY59, PLY60, TTV11, TTV15, TTV24, TTV28, TTV29	<u>Revised heading for tabular site allocation policies:</u> <u>'Policy considerations / things to be provided for by the development'</u>	Although not considered necessary for soundness, modification made to clarify the purpose of the heading.
AM57	Strategy for Plymouth Policy Area – Policy PLY37	9. Upgrading of flood defences, <u>maritime and harbourside infrastructure</u> including: <u>i Replacement of Sutton Harbour Lock Gate and Bridge,</u> <u>ii Improvements to West Pier,</u> <u>iii Completion of flood defences around Millbay.</u> <u>iv and strengthening Monitoring the condition of the breakwaters and other structures within Plymouth Sound and, in case of deterioration, identifying strategies to ensure the current benefits provided at the</u>	The modifications provide greater clarity about the nature of the infrastructure reflecting more closely the descriptions in the Infrastructure Needs Assessment.

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		<u>coast during coastal storms are retained.</u>	
AM58	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 <u>as provided for in Policy DEVI6.</u>	Although it is not strictly necessary we are happy to accommodate this wording change.
AM59	Strategy for Plymouth Policy Area – Opportunity Sites within Derriford and Northern Corridor Growth Area	<i>Remove section from the JLP</i>	The section can be removed as it duplicates provisions of PLY38.
AM60	Strategy for Plymouth Policy Area – Policy PLY48	<u>NEW POINT Provision of sustainable urban drainage systems and blue/green corridors to ensure the control of pollution and the management of flood risk.</u>	This modification reflects a provision of the strategic masterplan and is internally consistent with wider policies of the plan relating to drainage and water management, particularly DEV37.
AM61	Strategy for Plymouth Policy Area – Policy PLY48	3. Delivery of 200 hectares of Community Park (including 70 hectares of tree planting), <u>as provided for in Policy PLY49.</u>	This is considered a helpful cross reference.
AM62	Strategy for Plymouth Policy Area – Policy PLY48	7 ii Health and community facilities, including a town hall, library, youth centre and multi-faith building / <u>places of worship.</u>	Although it is not strictly necessary we are happy to accommodate this wording change, which in any case is consistent with SPT2.9
AM63	Strategy for Plymouth Policy Area –Policy PLY49	Sherford Community Park will provide a new high quality multi-functional green space for the residents of the new community and the surrounding neighbourhoods. <u>Any significant changes to the approved boundary will need to be supported by a revised Sherford strategic masterplan as provided for in Policy PLY48.</u> It will be a minimum of 200ha and will reinforce the eastern boundary for the new community, ...	This modification does not change the context of the policy, it merely acknowledges that for very large scale projects changes do occur. This point is already acknowledged in relation to PLY48, which provides for the eventuality of changes to Sherford and a revised strategic masterplan.
AM64	Strategy for Plymouth Policy Area – Policy PLY53	7. A form of development which visually makes a positive contribution to the wider <u>historic</u> landscape setting <u>and the setting of the designated Boringdon Arch.</u>	The modification is considered to provide helpful specificity about the particular assets the provision relates to. The landscape setting is an historic setting, of which the Boringdon Arch is a major features, as supported by the plan's landscape assessment (EN27)

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			and historic environment assessment (HE4).
AM65	Strategy for Plymouth Policy Area – Policy PLY56.4	4. Flood mitigation measures <u>to ensure development is safe and does not increase flood risk elsewhere.</u>	The modification merely explains the purpose of the provision, consistent with the wider policies of the plan, particularly DEV37.
AM66	Strategy for Plymouth Policy Area – Policy PLY56.4	<u>NEW POINT Investigation and remediation of contaminated land.</u>	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Environment Agency. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2.
AM67	Strategy for Plymouth Policy Area – Policy PLY56.5	3. Flood mitigation measures <u>to ensure development is safe and does not increase flood risk elsewhere.</u>	The modification merely explains the purpose of the provision, consistent with the wider policies of the plan, particularly DEV37.
AM68	Strategy for Plymouth Policy Area – Policy PLY56.5	<u>NEW POINT Investigation and remediation of contaminated land.</u>	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Environment Agency. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2.
AM69	Strategy for Plymouth Policy Area – Policy PLY58.9	2. Contamination remediation. <u>Investigation and remediation of contaminated land.</u>	The amended wording has the same effect as the original.
AM70	Strategy for Plymouth Policy Area – Policy PLY58.12	2. Delivery of a sustainable urban drainage solution to provide an improvement to surface run off rates <u>to and from</u> the site.	The modification is considered to provide helpful clarification and does not change the context of the policy.
AM71	Strategy for Plymouth Policy Area – Policy PLY58.13	<u>NEW POINT Flood resistant and resilient design to address existing surface water issues.</u>	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Environment Agency. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV37.
AM72	Strategy for Plymouth Policy Area – Policy	<u>NEW POINT A sensitively designed landscape scheme to minimise the impact of nearby highly graded heritage assets.</u>	The modification is not strictly necessary; however, we are happy to accommodate the change which has

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	PLY59.11		been sought by Historic England. The new point reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV21 and DEV22.
AM73	Strategy for Plymouth Policy Area – Policy PLY59.18	<u>NEW POINT Retention of existing playing pitch.</u>	Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan – particularly DEV3 and DEV4 - and is provided for in the planning consent for the site.
AM74	Strategy for Plymouth Policy Area – Policy PLY60.2	<u>NEW POINT Provision of safe pedestrian access / egress route in times of flooding.</u>	Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan – particularly DEV37 - and is provided for in the planning consent for the site.
AM75	Strategy for Plymouth Policy Area – Policy PLY60.6	<u>NEW POINT Measures to ensure development is safe and does not increase flood risk elsewhere.</u>	Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan, particularly DEV37.
AM76	Strategy for Plymouth Policy Area – Policy PLY60.7	<u>NEW POINT Measures to ensure development is safe and does not increase flood risk elsewhere.</u>	Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan, particularly DEV37.
AM77	Strategy for Plymouth Policy Area – Policy PLY60.8	<u>NEW POINT Measures to ensure development is safe and does not increase flood risk elsewhere.</u>	Although not strictly necessary, we are happy to include this new point which is consistent with the requirements of other policies of the plan, particularly DEV37.
AM78	Strategy for TTV Policy Area – Strategic Outcome for ‘our strategic approach to development in SW Devon’	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 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	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by Historic England.

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		contribute to a thriving rural economy through investment in traditional industries and innovative diversification.	
AM79	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.	The modification is not strictly necessary; however, we are happy to accommodate the change which has been sought by several parties.
AM80	Strategy for TTV Policy Area –para 5.11	Outside of the settlements and in the wider rural area, it is significantly more challenging to meet the requirements of sustainable development. Paragraph 54 if 55 of the NPPF highlights that isolated homes in the countryside should be avoided, and only allowed where there are special circumstances. This is considered further in Policy TTV30.	Correction of error
AM81	Strategy for TTV Policy Area –Policies TTV2	The LPAs will support development proposals in the Thriving Towns and Villages Policy Area which reinforce the sustainable settlement hierarchy and which deliver a prosperous and sustainable pattern of development. In addition to the provisions of Policies SPT1 and SPT2, specific attributes objectives of rural sustainability to be supported through development include: ...	This is merely a change in terminology, without any change to the context of the policy.
AM82	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.	Although it is not strictly necessary we are happy to accommodate this wording change as requested by Historic England.
AM83	Strategy for TTV Policy Area – Policy TTV2	<u>NEW POINT The delivery of natural infrastructure, where appropriate, alongside new development.</u>	Although it is not strictly necessary we are happy to accommodate this modification sought by Natural England which is consistent with the main town spatial priorities and supported by the sustainable development focus of the plan (eg SPT1.3ii; SPT2.7).
AM84	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 such, proposals that contribute to securing rural public transport services will be encouraged, with developer contributions sought where appropriate.	Although it is not strictly necessary we are happy to accommodate this wording change as requested by Devon County Council.
AM85	Strategy for TTV Policy Area – Strategic Objective SO7	4. Protecting and enhancing local distinctiveness and historic character of the Main Towns.	Although it is not strictly necessary we are happy to accommodate this wording change as requested by Historic England.
AM86	Strategy for TTV Policy	4. Connectivity across and along the River Dart will be improved by increasing	The modification removes what is arguably an over

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	Area – Policy TTV3	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).	precise provision.
AM87	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. The growth and function of Ivybridge, Tavistock, Totnes and Okehampton in particular are constrained by the highway network, necessitating There is a need for highway, public transport, cycling and walking measures, particularly in the towns of Ivybridge, Tavistock, Totnes and Okehampton , to alleviate congestion and encourage greater use of alternatives modes of transport to the private car.	This modification seeks to clarify text regarding transport issues within the towns, in response to issues raised by Devon County Council.
AM88	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. <u>In this respect, the protection of the AONB including its setting, in accordance with Policy DEV27, is a key priority for the area.</u>	Although it is not strictly necessary we are happy to accommodate this wording change as requested by S Devon AONB.
AM89	Strategy for TTV Policy Area – Policies TTV5	Land at Cotton is allocated for residential led mixed-use development. Provision is made for in the order of 450 new homes and 10,800 m of employment and floorpace (Use Classes B1).	Correction of error
AM90	Strategy for TTV Policy Area – Policy TTV5	4. Strategic landscaping, open space, and tree planting to address the scale and prominence of the site...	Although it is not strictly necessary we are happy to accommodate this wording change as requested by Natural England, and would have been sought through the application of other policies of the plan including particularly DEV20 and DEV24.
AM91	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.	Although it is not strictly necessary we are happy to accommodate this wording change as requested by Natural England, which is consistent with the requirements of DEV20.
AM92	Strategy for TTV Policy Area – Policy TTV5	<u>NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.</u>	Although not strictly necessary, we are happy to accommodate this minor modification requested by Natural England which is consistent with DEV2.4's

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AM93	Strategy for TTV Policy Area – Figure 5.3	<p>To be amended to reflect more accurately the location / nature of development and to be clearer on transport issues.</p>  <p>The diagram, titled 'IVYBRIDGE VISION DIAGRAM', shows a development site adjacent to the River Erme and Dartmoor National Park. A key identifies various facilities: Sports Hub (red circle with 'S'), Park and Ride (orange circle with 'P+R'), Mixed Use (blue circle), Town Centre (purple circle), Waste recycling (pink circle with 'W'), Community hub (pink circle with 'C'), Housing (brown house icon), Heritage led regeneration/improvements (purple house icon), Walking and Cycling Links (green line with arrows), Highway Network (grey line), Improved Road Connectivity (grey line with arrows), and Improvements to Strategic Public Transport Corridor (black dashed line). The diagram also shows a Railway line, National Cycle Network Route 2, and roads leading to Plymouth, London, and Exeter. The caption 'FIGURE 5.3' is located at the bottom right of the diagram.</p>	<p>requirements.</p> <p>The modification simply makes the diagram a bit clearer in the context of what is written in the JLP.</p>
AM94	Strategy for TTV Policy Area – Policy TTV10	<p>4. Strategic landscaping <u>to the site boundaries</u> help mitigate any adverse visual impact on Dartmoor National Park, and to soften the edges of the development onto the undeveloped countryside <u>and provide visual containment of the development in views from Dartmoor National Park.</u> The scale, design, <u>density</u>, 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.</p>	<p>Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.</p>
AM95	Strategy for TTV Policy	<p>NEW POINT Flood resistant and resilient design, without increasing</p>	<p>Although it is not strictly necessary the modification</p>

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	Area – Policy TTV11.1	<u>flood risk elsewhere.</u>	the new point has been sought by the Environment Agency, is consistent with the requirements of other policies of the plan (especially DEV37) and in any case is provided for in the planning consent for the site.
AM96	Strategy for TTV Policy Area – Policy TTV11.1	<u>NEW POINT Leat Management Plan to ensure the proper maintenance of the leat and mill pool, to manage flood risks and protect fish species.</u>	Although it is not strictly necessary the modification the new point has been sought by the Environment Agency, is consistent with the requirements of other policies of the plan (especially DEV28 and DEV37) and in any case is provided for in the planning consent for the site.
AM97	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. <u>Development within Kingsbridge will need to ensure that water quality issues within the Salcombe to Kingsbridge SSSI are not exacerbated.</u>	Although it is not strictly necessary we are happy to accommodate this wording change as requested by Natural England, which in any case would have been provided for by DEV28 and DEV37.
AM98	Strategy for TTV Policy Area – Policy TTV14	2. Strategic landscaping to within <u>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.</u> The scale, design, <u>density</u> and northern extents of development should ensure that development is congruous with the setting <u>adjacent settlement edge</u> when viewed from the surrounding countryside.	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.
AM99	Strategy for TTV Policy Area – Policy TTV14	4. A site wide Sustainable Drainage Strategy to ensure that drainage requirements can be met on site <u>without exacerbating water quality issues within the Salcombe to Kingsbridge SSSI</u> and are designed to deliver landscape, biodiversity and amenity benefits.	The caveat would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.
AM100	Strategy for TTV Policy Area – Policy TTV14	<u>NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.</u>	Although not strictly necessary, we are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.
AM101	Strategy for TTV Policy	1. Appropriate <u>Open space and strategic</u> landscaping to <u>the western</u>	Although it is not strictly necessary the modification

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	Area – Policy TTV15.2	edge of the site address the prominence and scale of development, and the creation of a landscape framework throughout the development.	provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.
AMI02	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.	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27.
AMI03	Strategy for TTV Policy Area – Policy TTV15.2	NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.	The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.
AMI04	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.	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.
AMI05	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.	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.
AMI06	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.	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.
AMI07	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.	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.
AMI08	Strategy for TTV Policy Area – Policies TTV21	10. An appropriate strategy to mitigate for any impact on the Dolvin Road AQMA.	Correction of an error that has come to light. There is no Dolvin Road AQMA; this was a matter previously under consideration but no designation has

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			been made.
AMI09	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.	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV20, DEV24 and DEV27.
AMI10	Strategy for TTV Policy Area – Policy TTV21	<u>NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.</u>	Although not strictly necessary, we are happy to accommodate this minor modification which is consistent with DEV2.4’s requirements.
AMI11	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. ...	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
AMI12	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.	The modification is considered to provide helpful clarification, consistent with the provisions of DEV21 and DEV22.
AMI13	Strategy for TTV Policy Area – Policy TTV27	<u>NEW POINT Investigation and remediation of contaminated land.</u>	Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2.
AMI14	Strategy for TTV Policy Area – Policy TTV28.4	<u>NEW POINT Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.</u>	Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20, DEV21 and DEV22.
AMI15	Strategy for TTV Policy Area – Policy TTV28.5	1. Delivery in accordance with the provisions of the 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.	Although not strictly necessary, we are happy to include this modification which is consistent with the requirements of other policies of the plan, particularly DEV28 and DEV37, and in any case is provided for in the planning consent for the site.

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AMI16	Strategy for TTV Policy Area – Policy TTV28.5	<u>NEW POINT Sensitive and high quality design which integrates with the existing area and the setting of nearby heritage assets.</u>	Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20, DEV21 and DEV22.
AMI17	Strategy for TTV Policy Area – Strategic Objective SO8	<u>NEW POINT Conserving and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.</u>	The modification although unnecessary is consistent with the historic environment policies of the plan, particularly DEV21 and DEV22.
AMI18	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 <u>and the Outstanding Universal Value of the World Heritage Site.</u>	The modification is considered to provide helpful clarification and does not change the context of these provisions of the plan.
AMI19	Strategy for TTV Policy Area – new para after para 5.126	<u>Additional primary school capacity may be needed during the plan period. Land to the south of Hatherleigh primary school was identified for this purpose in the West Devon Local Plan 2005 (Policy H45), and this will be an option for further consideration with Devon County Council. Should it be determined that additional land is required this will be identified through local planning documents linked to the provisions of Policy SPT12.</u>	This new paragraph flags up the education capacity issues, which Hatherleigh development proposals will need to respond to – this in any case being a requirement of Policies DEV32 and DEL1.
AMI20	Strategy for TTV Policy Area – Policy TTV29.1	1. Layout, and design <u>and location of structural landscaping</u> to be guided by landscape assessment.	Although it is not strictly necessary in that this would have been covered by DEV20 and DEV24, we are happy to accommodate this wording change as requested by Natural England.
AMI21	Strategy for TTV Policy Area – Policy TTV29.2	1. Layout, and design <u>and location of structural landscaping</u> to be guided by landscape assessment.	Although it is not strictly necessary in that this would have been covered by DEV20 and DEV24, we are happy to accommodate this wording change as requested by Natural England.
AMI22	Strategy for TTV Policy Area – Policy TTV29.12	<u>NEW POINT Contributions to expanding primary school capacity in the area.</u>	The modification is consistent with the requirements of DEV32 and DEL1 where there are school capacity issues.
AMI23	Strategy for TTV Policy	<u>NEW POINT Contributions to expanding primary school capacity in</u>	The modification is consistent with the requirements

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	Area – Policy TTV29.13	<u>the area.</u>	of DEV32 and DELI where there are school capacity issues.
AMI24	Strategy for TTV Policy Area – Policy TTV29.17	2. Layout, and design <u>and landscaping</u> to be guided by landscape assessment, <u>with careful consideration of scale and appearance of development, and the lighting of the site, to minimise wider landscape impacts.</u>	Although it is not strictly necessary in that this would have been covered by DEV2, DEV20 and DEV24, we are happy to accommodate this wording change as requested by Natural England.
AMI25	Strategy for TTV Policy Area – Policy TTV29.18	<u>NEW POINT Contributions to expanding primary school capacity in the area.</u>	The modification is consistent with the requirements of DEV32 and DELI where there are school capacity issues.
AMI26	Strategy for TTV Policy Area – Policy TTV29.19	<u>NEW POINT Strategic landscaping bordering the site.</u>	Although not strictly necessary, we are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV20 and DEV24.
AMI27	Strategy for TTV Policy Area – Policy TTV29.19	<u>NEW POINT Careful consideration of the scale and appearance of the development, and the lighting of the site, to minimise wider landscape impacts.</u>	We are happy to include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2, DEV20, DEV24 and DEV27.
AMI28	Strategy for TTV Policy Area – Policy TTV29.19	<u>NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.</u>	The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.
AMI29	Strategy for TTV Policy Area – Policy TTV29.21	1. 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 <u>and density</u> of development should ensure that it is not overly prominent when viewed from the surrounding countryside.	Although it is not strictly necessary we are happy to accommodate this wording change as requested, which in any case is consistent with DEV20.
AMI30	Strategy for TTV Policy Area – Policy TTV29.21	<u>NEW POINT A lighting strategy, which minimises the impact of light spill to the surrounding countryside.</u>	Although not strictly necessary, we are happy to accommodate this minor modification which is consistent with DEV2.4's requirements.
AMI31	Strategy for TTV Policy Area – Policy TTV29.21	<u>NEW POINT No exacerbating of water quality issues within the Salcombe to Kingsbridge SSSI.</u>	The modification would in any case have been a legal requirement consistent with other policies in the plan, and provided for by DEV28 and DEV37.
AMI32	Strategy for TTV Policy	<u>NEW POINT Careful consideration of extent, scale and appearance</u>	Although not strictly necessary, we are happy to

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	Area – Policy TTV29.21	<u>of development to minimise local landscape impacts.</u>	include this new point which reflects what would in any case have been required of a development consistent with the other policies of the plan, particularly DEV2, DEV20, DEV24 and DEV27.
AMI33	Strategy for TTV Policy Area – Policy TTV29.22	1. Recognising and enhancing the relationship with the South Devon AONB, <u>with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts.</u>	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27.
AMI34	Strategy for TTV Policy Area – Policy TTV29.24	1. Recognising and enhancing the relationship with the South Devon AONB, <u>with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts.</u>	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27.
AMI35	Strategy for TTV Policy Area – Policy TTV29.25	1. Recognising and enhancing the relationship with the South Devon AONB, <u>with careful consideration of scale, height, density, appearance and lighting of development, and strategic landscaping to minimise wider landscape impacts.</u>	Although it is not strictly necessary the modification provides helpful clarification, and would have been sought through the application of other policies of the plan including particularly DEV2, DEV20, DEV24 and DEV27.
AMI36	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 <u>and the village networks they serve.</u> This will be achieved through:	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)
AMI37	Strategy for TTV Policy Area – Strategic Objective SO9	<u>NEW POINT Protecting and enhancing the local distinctiveness and the historic character of the smaller towns and key villages.</u>	Although it is not strictly necessary we are happy to accommodate this additional wording sought by Historic England.
AMI38	Strategy for TTV Policy Area – Strategic Objective SO10	Maintaining a <u>naturally</u> beautiful and thriving countryside: To <u>protect, conserve</u> preserve and enhance the natural beauty of South West Devon's countryside, and to avoid the creation of new homes development in unsustainable or inappropriate locations.	The modification is considered to be helpful and consistent with the spatial strategy and development policies of the plan.
AMI39	Strategy for TTV Policy Area – new para after	<u>Further design guidance on the implementation of Policy TTV32 will be included in the Thriving Towns and Villages SPD.</u>	The modification is considered to be helpful clarification, and does not change the context of the

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	para 5.166		paragraph.
AMI40	Development Policies – Strategic Objective SO11	To deliver development which is sustainable and of the right type for its location and of good quality, which:	The modification is considered to be helpful clarification, and does not change the context of the objective.
AMI41	Development Policies – Policy DEV3	1.Supporting the creation of new or enhancing existing sports facilities where a need has been identified, including bringing private and education related sports facilities into wider community use.	The modification is considered to be helpful clarification about one potential supply source for sports facilities and does not change the context of the policy.
AMI42	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.	Although this modification is not considered strictly necessary, this part of DEV4 could be seen as unnecessary duplication and over-elaboration of the provisions of DEV3, and Sports England have asked for its removal.
AMI43	Development policies – narrative after Policy DEV4 – new para after para 6.15	<u>The policy distinguishes between larger and smaller sites. This reflects the general principle that it is better to provide playing pitches closest to the point of need. However, the application of this principle will need to be determined on a case-by-case basis, having regard not only to the practicality and viability of delivering on-site provision, but also to the context of the development in relation to other sports infrastructure within the locality. For example, it is more appropriate to deliver sports facilities in hubs rather than as isolated facilities. For this reason, the policy does not identify a site size threshold to define ‘larger sites’, and instead leaves this to the planning application process.</u>	The modification doesn’t change the policy but provides clarity about how the words ‘larger’ and ‘smaller’ used in the policy are to be interpreted. This would have otherwise been covered in SPD, where further guidance can still be provided.
AMI44	Development policies – Policy DEV9	4i Requiring at least 20 per cent of dwellings on all schemes of five or more dwellings (including conversions), where possible practicable , to meet national standards for accessibility and adaptability (Category M4(2) of Building Regulations).	Minor wording change to improve the clarity of the policy.
AMI45	Development policies	8. Houses in Multiple Occupation will only be permitted where the proposal:	Minor wording changes to improve the clarity of the

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	– Policy DEV10	i. Provides adequate communal space for future residents including sufficient space to accommodate cooking, dining, bathroom and toilet facilities. ... iii. Will be adequately managed in perpetuity including external maintenance and upkeep of the building and curtilage. ...	policy.
AMI46	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.	The additional elements of this point are consistent with what would be required to meet other policies of the plan, especially DEV33 and DEV37 but it is helpful clarification to include them specifically here.
AMI47	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.	The modification is considered to be helpful clarification.
AMI48	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 adverse residual impacts on neighbouring uses and the environment.	The modification adds clarity to evidence that will be needed in the context of wider policies to safeguard the environment.
AMI49	Development Policies – Policy DEV15	2. Business start-ups, home working, small scale employment and the development and expansion of small business in residential and rural areas will generally be supported, subject to an assessment of their impact that demonstrates no residual adverse impacts on neighbouring uses and the environment.	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI50	Development Policies – Policy DEV15	7. The loss of tourist or leisure development will only be permitted where there is no proven demand for the facility. Camping, caravan, or chalet or similar facilities that respond to an identified local need will be supported, provided the proposal is compatible with the rural road network, has no adverse environmental impact and is not located within the Undeveloped Coast policy area.	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI51	Development Policies – Policy para 6.73 (DEV19)	The Supplementary Planning Documents for the Plymouth and Thriving Towns and Villages Policy Areas will provide guidance on the implementation of this policy, including in cases where the delivery of a local employment growth scheme is not practical or feasible.	The modification is merely to acknowledge a need for some flexibility in implementation of the policy in that there could be circumstances where provisions in the policy might not be able to be achieved. We do not consider the change a soundness matter but a point of clarification in response to a discussion at the hearing.

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AMI52	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.	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI53	Development Policies – Policy DEV24	2. Conserve and enhance the characteristics and views of the area along with valued attributes and existing site features such as trees, and hedgerows and watercourses that contribute to the character and quality of the area.	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI54	Development Policies – Policy DEV24	6. Where necessary, be supported by Landscape and Visual Impact Assessments and landscaping schemes that enhance that proposed development.	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI55	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. In this regard, landscape and visual impact assessments will need to be provided where appropriate.	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI56	Development Policies – Policy DEV25	4. Is consistent with policy statements for the local policy unit in the current Shoreline Management Plan 2.	This is a helpful suggestion to future proof the policy and does not change the context of the policy.
AMI57	Development Policies – Policy DEV25	NEW POINT is consistent with the relevant Heritage Coast objectives, as contained within the relevant AONB Management Plan.	Although this modification is not strictly necessary, we are happy to support the inclusion of this new point as it reflects what is already intended.
AMI58	Development Policies – para. 6.91 (which will split into 3 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	The modification is considered to be helpful clarification, and does not change the context of the policy.

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		<p><u>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.</u></p> <p>This policy seeks to protect this region’s valuable undeveloped coast and defined Heritage Coast, ensuring that only development that contributes positively to its character is permitted. <u>The South Devon AONB Management Plan incorporates the objectives and targets for the South Devon Heritage Coast.</u></p>	
AMI59	Development Policies – Policy DEV27	<p><u>The highest degree of protection will be given to the protected landscapes of the South Devon AONB, Tamar Valley AONB and Dartmoor National Park.</u> 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:</p>	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI60	Development Policies – Policy DEV27	<p>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.</p>	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI61	Development Policies – Policy DEV27	<p>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.</p>	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI62	Development Policies – Policy DEV27	<p>8. Require development proposals located within or within the setting of the AONB a protected landscape to:</p>	The modification is considered to be helpful clarification, and does not change the context of the policy.

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AMI63	Development Policies – Policy DEV27	8 i Conserve and enhance the natural beauty of the area <u>protected landscape with particular reference to their special qualities and distinctive characteristics or valued attributes.</u>	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI64	Development Policies – Policy DEV27	8 vii Retain links, where appropriate, with the distinctive historic and cultural heritage features of the area <u>protected landscape.</u>	The modification is considered to be helpful clarification, and does not change the context of the policy.
AMI65	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. <u>It will which promotes sustainable transport choices and facilitates sustainable growth that respects the natural and historic environment.</u> Development proposals should therefore, where appropriate:	Although it is not strictly necessary we are happy to accommodate these wording changes as requested by Historic England (given that policies protecting the historic and natural environment are elsewhere in the plan).
AMI66	Development Policies – Policy DEV31	6. Mitigate the environmental impacts of transport, including <u>impacts on</u> air quality, and noise pollution, <u>landscape character and the quality and distinctiveness of urban and rural environments.</u>	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
AMI67	Development Policies – Policy DEV37	3. Development proposals at sites which fall into Flood Zones 2 or 3 (in whole or in part) should <u>as a minimum:</u>	Although it is not strictly necessary we are happy to accommodate this wording change as requested by the Environment Agency.
AMI68	Development Policies – Policy DEV37	<u>NEW SUB POINT UNDER POINT 3 Promote the safety of people in consultation with emergency planning services.</u>	Although it is not strictly necessary we are happy to accommodate this provision as requested by the Environment Agency.
AMI69	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 <u>drainage hierarchies set out in the Plymouth and Devon Local Flood Risk Management Strategies.</u> 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.	The modification is considered to be a helpful clarification and simplification of the policy. The modification does not change the context of the policy.
AMI70	Development Policies	8. Development will not be permitted without confirmation that sewage /	The modification is considered to be helpful

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	– Policy DEV37	wastewater treatment facilities can accommodate or will be improved to accommodate the new development, in advance of the development taking place.	clarification, and does not change the context of the policy.
AM171	Development Policies – para 6.137	The policy <u>supports national requirements for all major development to incorporate sustainable urban drainage systems (SUDS) and</u> 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. <u>Discharges of surface water flows to the combined sewer should be avoided as they 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.</u> Development should incorporate water efficient design principles, ...	The modification is considered to be helpful clarification, and does not change the context of the policy.
AM172	Development Policies – new para after para 6.137	<u>Plymouth City Council’s Local Flood Risk Management Strategy sets out a drainage hierarchy which differs from the Devon County Council in that discharge of surface water to a waterbody is identified ahead of infiltration, both hierarchies are set out in the relevant Local Flood Risk Management Strategies. A number of factors have led to a different approach in Plymouth including the strategic location of waterbodies within Plymouth Surface Water drainage catchments, the presence of contaminated land, the dense urban nature of Plymouth and development sites restricting soakaway location, an underlying geology that varies locally combined with steep topography which can increase the risk of groundwater re-emergence. This approach is better able to support rain water harvesting by allowing surface water to be intercepted prior to discharge, which in turn had ecological and amenity benefits and also proves easier to adopt and maintain in an urban area.</u>	The modifications are considered to be helpful clarifications consequential to the proposed modifications of DEV37.
AM173	Development Policies – new para after para 6.138	<u>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</u>	The text provides potentially helpful information which we are happy to include.

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		<u>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.</u>	
AM174	Development Policies – Policy DEV38	5. If it is a replacement proposal, the gross volume of the replacement dwelling <u>building or structure</u> is no larger than the one it is to replace.	The modification is considered to be helpful clarification, and does not change the context of the policy.
AM175	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, <u>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.</u>	Although it is not strictly necessary we are happy to accommodate this wording change as requested.
AM176	Delivery and monitoring – Policy DEL1	5. Requiring robust viability evidence to be submitted where a developer contends that planning obligations sought, <u>including for affordable housing</u> , would make a proposal economically unviable. The LPAs will seek an open book approach in these cases. ...	Although not strictly necessary, this modification was suggested by the inspectors during the discussion on whether or not DEV7 and DEV8 should say 'subject to viability'. It is for the purposes of clarification in that context, and not an issue of soundness.
AM177	Annex 1 – Plymouth Policy Area	NEW ITEM <u>Improvements to the A38 trunk road and its main junctions (including the Weston Mill junction and widening of the A38 between Weston Mill junction and Forder Valley junction).</u>	The measures are already identified in SPT8.4i and PLY61.1 although the modification adds a bit more detail.
AM178	Annex 1 – TTV Policy Area – Main Towns	NEW ITEM <u>Tongue End Cross – Junction of A30 and B3260 minor scheme</u>	The measures set out a particular improvement scheme that Highways England would seek as part of meeting the requirements of TTV19.2.
AM179	Annex 2 – Plan Targets and Direction of Travel Indicators	114 <u>Water body classification</u> and bathing water quality.	We are happy to amended 114 to accommodate this request.

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AM180	Glossary	<u>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.</u>	Although not strictly necessary, we are happy to include this new item.
AM181	Glossary	<u>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 interchangeable with Natural Infrastructure.</u>	This is a helpful addition.
AM182	Glossary	<u>Natural Infrastructure - For a definition see 'Green Infrastructure'. Natural Infrastructure is used more often due to the need to consider Plymouth's blue aquatic and marine environment which often gets forgotten through the use of 'green'.</u>	This is a helpful addition.
AM183	Glossary	Office of Rail Regulation and Road (ORR) -The independent safety and economic regulator for Britain's railways. <u>Provides regulation on safety and performance of the rail industry across the UK and monitors Highways England.</u>	Updated description.
AM184	Glossary	<u>Priority Habitats – Those identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)</u>	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.