**TORBAY LOCAL PLAN**

A landscape for success

The Plan for Torbay – 2012 to 2032 and beyond

SUBMISSION PLAN

**SCHEDULE OF CHANGES TO THE PROPOSED SUBMISSION PLAN (FEBRUARY 2014) SUGGESTED BY TORBAY COUNCIL FOR CONSIDERATION AT EXAMINATION**

**VOLUME 2: CHANGES BY PARAGRAPH AND POLICY NUMBER**

REVISED

Torbay Council – November 2014

**Explanatory note: Torbay Council schedules of suggested changes to the Proposed Submission Plan for Torbay, Sustainability Appraisal and Habitats Regulations Assessment**

Following publication of the Proposed Submission Plan on 24 February 2014, a number of representations were received during the subsequent formal consultation period, which ran for six weeks until 7 April. These representations covered a range of topics and issues relating both to general editorial and specific soundness matters. All representations have been registered and key points summarised (see Submission Document SD14 ‘Regulation 20 Statement – Publication of Proposed Submission Plan and representations made’.

Subsequently, the Council has been working with its various partners and other interested parties to address the various representations received. To assist both the Examination Inspector and representors, Officers have now compiled a schedule of suggested changes to the content of the Proposed Submission Plan. These at set out in Submission Documents SD20 ‘Schedule of suggested Torbay Council changes for consideration at Examination [Volume 1: Changes by organisation]’ and SD21 ‘Schedule of suggested Torbay Council changes for consideration at Examination [Volume 2: Changes by paragraph and policy number]’.

All suggested changes have been subject to further Sustainability Appraisal and, where appropriate, to Habitats Regulations Assessment. As a consequence, this schedule is also accompanied by schedules of suggested changes to both the SA and HRA (see Submission Documents SD22 ‘Schedule of suggested Torbay Council changes to February 2014 Sustainability Appraisal for consideration at Examination’ and SD23 ‘Schedule of suggested Torbay Council changes to February 2014 Habitats Regulations Assessment for consideration at Examination’. Many of the suggested changes have been the subject of extensive negotiation with specific representors and in some cases have resulted from the commissioning of additional evidence base survey work (eg in response to comments by English Heritage and Natural England – see Submission Documents SD26 ‘Torbay Council response to representations by Natural England’ and SD27 ‘Torbay Council response to representations by English Heritage’

This work is ongoing and may continue during the course of the Examination, in the context of advice from the Inspector. In the meantime, in the period preceding formal Submission, these schedules have been reviewed and supported by the Council’s Director of Place and the Executive Member for Planning, Housing and Waste. However, they have not received full Member approval or any formal public consultation, two courses of action that would be inappropriate at this stage prior to Examination of the Proposed Submission Plan.

Essentially, the majority of suggested changes have been suggested by the Council’s Officers in order to provide clarification or amplification of the Plan’s existing supporting text and specific policies, as well as addressing omissions, typographical errors, superseded data, factual errors and inserting cross references.

It is the Council’s view that these changes do not represent any significant shift in the planning policy framework for Torbay as set out in Submission Plan, nor do they in any way change the proposed level, location or direction of the proposed growth strategy. They therefore do not go to the ‘heart’, the core strategy, of the Plan and the Council remains of the view that the Plan as submitted is sound. It is considered that the suggested amendments do not amount to a scale and level of change that would render the current Proposed Submission Plan significantly different to the version published in February 2014, and to therefore necessitate further advertisement and consultation prior to Submission. Rather, the suggested amendments, which are broadly acceptable to officers, add value to the Plan by providing clarification and improvement of the proposed development framework.

Accordingly, the appointed Inspector is invited to consider the suggested changes set out in the four schedules referred to (Submission Documents SD20, SD21, SD22 and SD23) as part of formal deliberations on the soundness of the overall Plan. Where appropriate, this might also take place as part of the debate on specific key issues to be identified for debate during the Hearing session of the Examination. The Council would welcome the Inspector’s advice on how to embrace the Council’s submitted schedules in the Examination process, and would support any suggestion that they be the subject of public consultation towards the end of the Examination process, either on a free standing basis, or alongside or as part of any proposed Main Modifications should the Inspector consider that course of action to be necessary.

A small number of subsequent changes have arisen out of further discussions with Natural England and other stakeholders after the Submission of the Local Plan in July 2014. These later suggested changes are shown in **highlighted emboldened green.**

**Torbay Local Plan- A Landscape For Success. The Plan for Torbay 2012-32 and beyond: Schedule of changes to the Proposed Submission Plan (February 2014) suggested by Torbay Council for consideration at Examination. Revised Nov 2014**

|  |  |  |
| --- | --- | --- |
| **Local Plan paragraph**  | **Amended Text**  (newexplanatory text set out in **emboldened black.** Amended Policy Text set out in **emboldened red** ~~Deleted text shown as strikethrough)~~ | **Reason for Editorial Modification** |
|  | All square metre area measurements should read Sq m (or M^2 ) and not metres squared (M2 ) | Editorial clarification  |
| 1.1.3 | Amend last sentence: ~~but the growth trend will be upwards – particularly after 2018 when the market is expected to improve.~~  **but the Local Plan seeks to set out a sustainable strategy to accommodate needs within environmental and infrastructure limits**.  | Editorial clarification in response to Paignton Neighbourhood Forum (PNF) and others. Clarify the role of 5 yearly review. |
| 1.1.5  | Amend as follows: ~~demand for new homes starts to rise and investment delivers improved infrastructure.~~ **The Local Plan’s strategy will be subject to major five year reviews, where evidence of the need for development and the Bay’s capacity to accommodate it will be reassessed.**  | As above  |
| 1.1.8 | Line 7 Replace “we know” with **“the Council has assessed”**  | As above. Editorial for epistemological accuracy.  |
| 1.1.15 | Third sentence add after “A basket of measures will be used to determine **whether the Local plan’s growth strategy remains supported by evidence of need and capacity. It will consider** whether additional land is needed….  | Editorial clarification in response to Paignton Neighbourhood Forum (PNF) and others |
| 2.1.2 | Fourth line, after landscape add **“historic”**End of first bullet point: “**that enhances and realizes the economic potential of the historic environment”** | English Heritage |
| 2.2.5 | After first sentence add “**progress towards creating jobs and improving the local economy will be assessed as part of the Local Plan review**” - | Editorial clarification in response to Paignton Neighbourhood Forum (PNF) and others |
| 2.2.9 | Add reference to conservation assets at 2.2.9: **Torbay has a rich historic environment, with significant prehistoric, mediaeval, C18th and 19th assets.** | English Heritage  |
| 2.2.11  | Amend penultimate sentence:**…**South Hams **as part of an ongoing duty to cooperate to consider housing need and sustainability on a cross boundary basis by the LPAs in the area.** This reserve will only be drawn on when demand shows it is needed, add **having regard to the most up to date evidence of objectively assessed need** **(see paragraph 7.5.14 below).**  | Comments by South Hams District Council and PNF. Clarification of five year review.  |
| 2.2.13 | N.B This paragraph cites external statistics etc that will need updating as new data becomes available. Bullet 2 second sentence amend: **The most recent projections 2012 based sub-national population projections, released May 2014, project a population increase from 132,300 in 2014 to 134,450 in 2021 and 138,900 in 2032- an increase of 11,000 people over the Plan period. Torbay’s population growth is driven by (domestic) migration.**  | Updating text/PNF |
| 2.3.1 | Economic Recovery and Success- last bullet point add the **historic and** marine environment  | English Heritage  |
| 2.3.1 | Protect and enhance a superb environment – add bullet point **protect and enhance country parks**Penultimate bullet Enhance the Yalberton Valley and **Westerland****Valley***, for nature conservation and ~~green~~* ***sustainable*** *tourism* | PNF/Cockington et al Community Partnership/ English Riviera Tourist Board  |
| 2.3.1 | Create more sustainable local places. Add new penultimate bullet point: **provide affordable homes for local people**Revise last bullet point: Support affordable self build and **custom built** homes for local people, across the bay New last point: **Seek to minimise crime, fear of crime, disorder and antisocial behaviour through appropriate design, management and location of development.**  | South West HARPDevon and Cornwall Police ALO |
| Aspiration 1 | New bullet point “**To ensure a balanced provision of housing and employment”** | PNF and others |
| Aspiration3 | Bullet point 1 To safeguard heritage assets, **including those at risk**…Bullet point 2 landscape character **river corridors, open spaces, country parks and natural areas** and setting of proposals Last bullet add and **sustainable tourism value** | English HeritageNatural England, South Devon AONB.Environment AgencyCockington etc Community Partnership, ERTB |
| Aspiration 5  | (Bullet 5) add: **by incorporating climate change factors such as run-off, sea level rise, increased storminess and unpredictable weather.** (Bullet 6) add **“over the lifetime of development”.**  | Environment Agency  |
| 4.1.11 | Bottom line add AONB, **historic environment**, valuable…. | English Heritage  |
| Picture 4.1 Key Diagram  | Expand indicative line SDB3.1 east to cover Galmpton  | Churston Galmpton and Broadsands Community Partnership |
| Policy SS1  | After premier resort in paragraph 2, add: **All development should safeguard the area’s natural and built environment and in particular the safeguarding and mitigation of greater horseshoe bats and other protected species and their habitats.** Existing Commitments, second sentence “**Most of** this growth…” | Natural England. HRA Appraisal Report in response to Natural England’s HRA Objection. PNF/ factual clarification |
| 4.1.20 | **Delete existing 4.1.20 and replace with: Torbay has significant environmental constraints, including being within the flight paths and foraging zone of the South Hams Special Area of Conservation. The Habitats Regulations Site Appraisal Report of the Torbay Local Plan (Kestrel Wildlife 2014) identifies a number of mitigations measures for safeguarding the integrity of the SAC. The greater horseshoe bat mitigation strategy should be implemented within development areas. Further details are set out in Policy NC1 and the Strategic Delivery (“SD”) policies of this Plan. This includes maintenance of darkened corridors to maintain flight paths, and the use of developer contributions to manage increased recreational pressure on the South Hams SAC resulting from increased housing numbers and recreational pressures.** |  |
| 4.1.21  | Last line natural **and historic** environment | English Heritage |
| SS2  | Future Growth Areas are proposed in the following locations: 1. Edginswell, Torquay
2. ~~Land around~~ **Paignton North and West Area including** Collaton St. Mary, Paignton
3. Brixham Road, Paignton
4. Wall Park, Brixham

……A bespoke Greater Horseshoe Bat (GHB) mitigation plan for all development within the **following** Future Growth Areas must be submitted and approved before planning permission will be granted. **SDP 3.2 Great Parks** **SPP 3.3 Totnes Road/Collaton St Mary****SDP 3.4 Brixham Road/Yalberton****SDP3.5 White Rock****SDB 3.2 Wall Park** The  **mitigation** plan must demonstrate how the site will be developed in order to sustain an adequate area of non-developed land as a functional part of the local foraging area and flyway used by commuting GHBs associated with the South Hams SAC. The mitigation plan must demonstrate that development will have no adverse effect on the SAC alone or in combination with other plans or ~~projects~~ **developments.** Development **within the Brixham Peninsula (SPB1)** should have regard to Policy NC1 concerning and the ~~need~~ scope for developer contributions to mitigate the impact of **increased** recreational pressure on the South Hams SAC Development will ~~be~~ deliver the following:(i) Provision of a range of residential schemes that offer a mix of housing types, including family housing and affordable housing.(ii) Creation of a range of employment opportunities, delivered in the early stages ofdevelopment, designed to meet identified economic growth sectors;(iii) Essential transport and utilities infrastructure, as well as green infrastructure, andappropriate links to other planned facilities;(iv) A suitable range of recreational, leisure and tourism facilities;(v) High quality design standards that embrace sustainable and energy efficient construction techniques;(vi) The creation of a strong sense of community through the effective design and layout of homes and the provision of local facilities, enhancing wherever possible existing communities within the locality; and(vii) Appropriate phasing to ensure overall a balanced provision of jobs, homes and infrastructure (including green infrastructure).(**viii) Integrated Green Infrastructure rich in biodiversity to be enjoyed by local people.**All major development outside of the established built up area should be within the identified Future Growth Areas. Major development outside of these areas will only be permitted where the site has been identified by the relevant neighbourhood plan or a subsequent development plan document a**nd has first been subject to Habitat Regulations Assessment that has concluded there will be no likely significant effect on the South Hams SAC.** Such development proposals will need to take account of the impacts of the proposed development itself and the cumulative impact of development. | Policy revisions as requested by Natural England/HRA(see full explanation at NC1 below).**Additional changes in response to Natural England**  |
| 4.1.32 | **“Masterplans have been prepared for Torquay Gateway, Great Parks Paignton, and Collaton St Mary, Paignton as well as Torquay and Paignton Town Centres. These are expected to inform Neighbourhood Plans. Alternatively, they may be further consulted on as Supplementary Planning Documents”.**  | English Heritage and Natural England |
| 4.1.32 | After paragraph insert new text: **Greater horseshoe bat Mitigation strategy for the four Future Growth Areas should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.** | Natural England  |
| SS3  | positive approach ~~reflecting~~ **~~i~~n accordance with** the presumption in favour…  | Bloor Homes  |
| 4.1.36 | End of paragraph add: **“It will be noted that footnote 9 of the NPPF indicates that some matters such as AONB, habitats Regulations, flooding and coastal erosion and designated heritage assets may outweigh the presumption in favour of sustainable development.**  | Environment Agency, Natural England. This is a factual statement.  |
| 4.2.20 | Add new penultimate sentence: **for example, using South Devon College’s expertise in delivering renewable energy solutions in new, and upgrading existing development**.  | South Devon College |
| SS4, 4.2.18, 4.2.23. | References to M2 should read Sq M  | Editorial clarification.  |
| SS5  | **Add sentence to end of second paragraph**: This will include space and facilities for ‘Use Class B’ employment uses and other ‘non-Use Class B’ sectors including health, leisure, retail, tourism and education, which play an important role as employment generators in the Bay.  For major employment or mixed use developments, the Council will seek around 25% of space to be provided as ‘Use Class B’ space, to reflect the needs of the area and to increase GVA.  **An element of cross subsidisation of employment uses from higher value land uses will be sought.** Add to end of penultimate paragraph of SS5: **Where there is no reasonable prospect of the site being used for other (i.e. non Class B) employment purposes or such a use would conflict with the Local Plan, alternative uses that support sustainable local communities will be supported.** | SW HARP/Tetlow King revision to conform to NPPF paragraph 22.**Additional text to clarify delivery of employment land** |
| 4.2.26 | Add to end: **Whilst Policy SS5 allows for a mix of employment types, there is a need for class B1 and B2 jobs to increase the Bay’s value added and rebalance the economy away from the service sector. On this basis proposals that provide a high proportion of “B” space will be encouraged. The 25% noted above will not be seen as a maximum (see Glossary for definition of “B” space).**  | Torquay Town Centre Community Partnership and Cockington Chelston and Livermead Community Partnership |
| 4.2.27 | Add text to end of paragraph: **In order to secure the delivery of modern employment buildings, an element of cross subsidy will be sought from Masterplans and in the consideration of strategic development schemes (see glossary), This will be secured either through land equalisation agreements, direct provision of servicing of employment land/infrastructure or through developer contributions.** | **Additional text to clarify delivery of employment land** |
| 4.3.17 | reduce rat-running **including** through Marldon, Berry Pomeroy, **Galmpton,** **and reduce further afield impacts**. | South Hams District Council, Stoke Gabriel Parish Council. |
| 4.3.18 | After first sentence add: **Detailed routing will need to address matters such as rights of way.**  | Churston, Galmpton and Broadsands Community Partnership. |
| 4.3.23 | Add at end of paragraph: **such works should have regard to the requirements of the Habitats Regulations and be acceptable in terms of the Candidate SAC and Marine Conservation Zone.** | Natural England |
| SS7  | **Infrastructure phasing and delivery of development** **Amend paragraph 2 as follows:** In order to be permitted, development must be supported by provision of the critical infrastructure required for the development to proceed. **Development that does not meet critical infrastructure requirements such as flooding and highway safety matters will not be permitted.** **Add additional point to paragraph 6** In seeking developer contributions, regard will be had to:**2) The need to prioritise critical infrastructure, e.g. flood defence works**  | **Natural England**  |
| 4.3.27 | **4.3.27** This Study categorises three types of infrastructure needed in relation to development: 1. Critical infrastructure:  physical and enabling infrastructure, which must be delivered on time to allow proposed development to proceed in narrow physical or safety terms (e.g. road access, flood defence works, sewerage capacity, water and electricity). **Green infrastructure necessary to make development comply with Habitats Regulations requirements will be treated as critical infrastructure**:
 | **Natural England**  |
| 4.3.29 | **Add to end of paragraph/ create new paragraph:** **The Assessment of Future Sewer Capacity Study to 2032 (AECOM 2014) identifies the need for a programme of sustainable urban drainage (SuDs) and water sensitive urban design (WSUD). Policies ER1, ER2 and W5 deal with flood risk and water management in more detail.** There will be a need for developer contributions, whether s106 or CIL, to bridge infrastructure funding gaps.  **Matters that deal with critical infrastructure, such as flood protection, will be given the highest priority, and development will not be permitted if such matters cannot be satisfactorily addressed.**  | **Natural England**  |
| 4.3.34 | **Add to end of paragraph:** **However, notwithstanding the above considerations, developments that are unable to mitigate successfully matters such as flood risk will not be permitted.**  | **Natural England**  |
| 4.4.3 | Add penultimate sentence **The south of the Bay is part of the South Devon AONB** | South Hams District Council South Devon AONB Partnership,  |
| **SS8** | All development should have regard to its environmental setting and should positively contribute to the conservation and enhancement of the natural assets and setting of the Bay.The Council will ~~seek to~~ safeguard, conserve and enhance the valued qualities, features and attributes of sites protected under European legislation and other important natural landscape, including tranquillity, dark night skies, **bathing waters**, biodiversity and geodiversity **commensurate with their importance. It will ensure that:**  **1 (new point) Sites, species and habitats protected under European, or equivalent, legislation will be protected from development. Development, around the edge of the built up area will be required to protect and manage wildlife and habitats, including corridors between them, in accordance with Policy NC1. Particular attention must be paid to greater horseshoe bat flight paths, and cirl buntings.**2 (former 1) Delete “natural” before landscape in Line 23 (former 2) Development proposals outside the AONB will be supported where they conserve or enhance the distinctive landscape character **and biodiversity** of Torbay. Add to end of point 3 (former 2): However, it will be particularly important to ensure that development outside the AONB does not have an unacceptable impact on the special landscape qualities of an adjoining or nearby AONB **or other valued landscapes such as country parks.** 4 (former 3) The Council will, in considering major planning applications, seek long term land management practices to maintain or restore landscapes, greenspace, **dark corridors** and amenity open spaces, integrating biodiversity and green infrastructure objectives including improved public access. If development impacts adversely upon biodiversity, geodiversity or countryside management, developer contributions **and mitigation measures will** ~~may~~ be required to improve management or enhancement of the natural environment with a goal of achieving a net gain in biodiversity. | Natural England/HRA, Torbay Coast and Countryside Trust/ RSPB.  |
| 4.4.6 | Add to end of paragraph: **In addition to national sites, Torbay has a network of locally important wildlife sites and corridors. These are shown on the Policies Map and are addressed by Policy NC1 Biodiversity and Geodiversity. Other policies in the Local Plan such as C4 “Trees, hedgerows and natural landscape features” are also relevant.** **Regard should be had to the Nature of Torbay – a Local Biodiversity and Geodiversity Action Plan 2006-16 in respect of all target habitats and species in Torbay.**  | Natural England, TCCT RSPB, and others |
| 4.4.7  | Second sentence amend: The Council will **require no overall detriment** and seek net gains it the natural environment ~~as a desirable outcome~~ **in accordance with paragraphs 9 and 117 of the NPPF**End of paragraph add: **However such mitigation measures cannot be used to compensate intrinsically unsuitable development (see Policy NC1).** **High quality bathing waters are an important asset both for ecology and tourism in Torbay. The Bathing Waters Directive requires that the quality of sea water be improved. Policies ERR2, ER3 and W5 seek to minimise the impact of wastewater upon bathing water qualities, for example by removing existing and restricting new surface water connections to combined sewers.** | Natural England, RSPB, Churston Galmpton and Broadsands Community Partnership and others.Environment Agency.  |
| 4.4.9 | Add to end of paragraph: **Much landscape is manmade and there is an interrelationship between the historic and natural environment for example when considering hedgerows, field patterns and other naturalized features (see Policies HE1 (SS-) and C4.**  | English Heritage  |
| SS8.1/HE1 | Note that Policy HE1 will be re-badged as a strategic policy and inserted at this point.  |  |
| **Policy SS9** | add criteria **F) Maintain existing and contribute to new tree planting and woodland creation.**  | The Woodland Trust |
| 4.4.13 | Last line add: **Yalberton Valley****Add text to end of paragraph**: **The Recreational Impacts on Berry Head Study (Footprint Ecology 2014) has indicated that development within 5km of Berry Head (broadly equivalent to SDB1 Brixham Peninsula) could place additional pressure on this component of the South Hams SAC, and identified measures needed to be carried out to enhance the management and durability of Berry Head (See Policy NC1 below).** | Paignton Neighbourhood Forum, Stoke Gabriel PC and others. **Further changes in relation to Natural England** |
| 4.4.15 | Add: **Yalberton Valley between Great Parks and White Rock** End of paragraph add: **Country parks and other green infrastructure are often of historic importance, particularly Cockington and Berry Head, Brixham. Policy HE1 (SS-) is relevant to consideration of these historic assets.**  | As aboveEnglish Heritage |
| 4.5.12 | Evidence of Torbay’s housing **need** (delete “requirement”) **will be kept under review, particularly as population and household projections are regularly refreshed** (see Section 7.5 below). The current evidenceis set out in**: …and 2014 Household projections.** | Paignton Neighbourhood Forum and Others. Updating text in line with current evidence.  |
| 4.5.13 | Add: **The 2012 (published 2014) based population projections indicate a population increase of 11,000 people between 2012-32, which is a third lower than the 2011 based figure. Analysis of the projections shows that they are dependent upon high migration rates.**  | As above |
| 4.5.14 | Bullet 1 add: **ONS projections have been adjusted downwards over the past 10 years**. Bullet 3. Replace “Household sizes are falling” with **Household sizes did not fall between 2001-11, but may fall in the future, but any fall is likely to be** less fast than predicted…Last bullet add **However, deaths in Torbay still outnumber births by approximately 5:4.** | As above  |
| 4.5.25  | Homes required, **either upwards or downwards.**  | As above  |
| 4.5.26 | 20 years **and possibly beyond**  | As above  |
| **SS10** | Point 5add: **…whilst designing out opportunities for crime, antisocial behaviour, disorder and community conflict** | Police Architectural Liaison Officer  |
| 4.5.30  | Add text: **Planning should create safe and accessible environments where crime and the fear of crime do not undermine quality of life or community cohesion (NPPF paragraph 58 refers). The Police Architectural Liaison Officer (ALO) will provide advice and recommendations on designing out opportunities for crime, disorder, antisocial behaviour and community conflict in the built environment. In addition to design, the location and management of development are relevant. In appropriate cases the Council will work with the Police ALO to assess the potential crime (etc) impact of development and, where impacts can be mitigated, necessary management or mitigation measures (see also Policy TC5 Evening and nighttime economy and DE1 Design).** | As above  |
| 4.5.32 | Penultimate line delete ~~“over the next 5 years”.~~  |  |
| 4.5.34 | Delete paragraph after second sentence and replace with: The Council believes that the delivery of 8,000-10,000 new homes **meets the demographically implied provision in the 2012 based population projections and household projections derived there from, with an allowance for economic prosperity and meeting a backlog of need from hidden households.** This figure will need to be reviewed and adjusted for changes in migration rates household size and economic performance as part of a **major review of the Plan which will take place on a 5 yearly basis**.  | Paignton Neighbourhood ForumClarification that adjustments to 5 year supply can only practically be carried out as part of Local Plan review.  |
| **SS11** | Revise paragraph 3 as follows: Development **within the Brixham Peninsula (SDB1)** should have regard to Policy NC1 concerning the need for developer contributions to mitigate the impact of **increased** recreational pressure on the South Hams SAC. | Habitats Regulations Assessment**Natural England**  |
| **SS12**  | Second line replace trajectory with **requirement**  | Editorial clarification.  |
| 4.5.38 | After trajectory add **insofar as consistent with other policies in the NPPF**  | Paignton Neighbourhood Forum |
| 4.5.41  | Add (at end of paragraph): **As noted above, and in Section7.5, the Local Plan will be reviewed on a 5 yearly basis, which may result in the 5 yearly requirements being adjusted.**  | Paignton Neighbourhood Forum |
| 4.6.17 | End of Paragraph add: **It can also boost Torbay’s “green” economy**  | Environment Agency and others.  |
| **SDT1**  | End of paragraph 2 add: **Torbay whilst conserving or enhancing the historic and natural environment**End of paragraph 3 add: **priority species such as cirl buntings and greater horseshoe bats will be safeguarded.**  | Natural England and English Heritage |
| 5.1.1  | Last line add: strong **built and natural** environmental assets | As above  |
| 5.1.3 | After Class B Space add: **See Glossary**Refer to Sq M not M2 | Torquay town centre (etc) Community Partnership. |
| 5.1.4 | Add sentence: **Regeneration proposals should maintain or improve provision of public open space.** | St Marychurch and District Community Partnership |
| Table 5.1  | All square metre area measurements should read Sq m (or M^2 ) and not metres squared (M2 ) | Editorial clarification |
| Table 5.2, Table 5.5  | SHLAA sites elsewhere in SDT1 **Add note: includes Sladnor Park, Maidencombe, subject to landscape, biodiversity and access (etc) considerations**.  | PCL Planning  |
| **SDT2**  | End of first paragraph add ,**whilst conserving or enhancing the area’s historic character and environmental value** | English Heritage and Natural England.  |
| 5.1.1.1. | Add to end of paragraph: **The lower part of the town is within Torquay Harbour Conservation Area and development will be expected to complement the area’s historic character**.  | English Heritage |
| 5.1.2.2 | Eighth line after location of the site add: **In particular the setting of Edginswell Hall and Village will be conserved or enhanced.** Refer to sq m  | Mr Julian Sanders |
| **SDT3** | **SDT3:** Paragraph 3, **SDT3:** Paragraph 3 Amend: Any proposals that may lead to significant effects on sites protected under European Legislation, **including bats and cirl buntings** will only be permitted where no adverse effects on the integrity of the site can be shown. Add text afterparagraph 3:**Any detailed proposals for development in the area should first be informed by appropriate bat and cirl bunting surveys undertaken during a suitable time of year. Any biodiversity impact from development should be offset. Particular attention should be given to for loss of grassland (foraging) habitat and internal hedgerows. A buffer of darkened hedgerow should be provided and maintained, particularly along the western buffer, in accordance with Policy NC1.** | Natural England/HRA |
| Table 5.5 | Edginswell Future Growth Area add note: **This should make allowance for the high pressure gas pipeline north of the Future Growth Area, in consultation with National Grid**  | National Grid  |
| **SDP1**  | End of Paragraph 4 add: **Priority species such as bats and cirl buntings and their habitats will be safeguarded and any impacts mitigated.**  Refer to Sq M | Natural England/HRA |
| 5.2.2 | Add: **Regard should be had to the conservation or enhancement of the built, natural and historic environment, particularly within conservation areas, in accordance with other policies in this plan** | Natural England  |
| 5.2.3 | All square metre area measurements should read Sq m (or M^2 ) and not metres squared (M2 ) | Editorial clarification |
| 5.2.5 | Add text after 5.2.5: **A greater horseshoe bat mitigation objectives for SDP3 and SDP4 Strategic Delivery Areas should be implemented according to the recommendations of the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.**  | Natural England/HRA |
| **SDP3**  | Paragraph 1 amend line 2: range of **housing especially** family housing, employment, **local** recreation and local retail facilities. Paragraph 4 After South Hams SAC add **as well as other species such as cirl buntings**Paragraph 4 add to end of paragraph**: Greater horseshoe bat mitigation objectives for Great Parks, Collaton St Mary Future Growth Area, ~~Yalberton Industrial Estate, Claylands~~ and Brixham Road, should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.** | Devonshire Park Natural England/ HRA/ RSPB at Draft. **Further amendment as requested by Natural England** |
| 5.2.2.1 | **Add text to middle of paragraph**: The west of Paignton offers the largest area of land for expansion within Torbay, although there are infrastructure requirements that need to be met prior to or in parallel with major development.  A significant amount of growth is already underway at Yalberton and White Rock. Further development is committed at Great Parks. **This is shown as a grey (committed) site on the Policies Map. However, in the event of the development taking longer to build out than anticipated, it will be treated as a Future Growth Area (see SS2 and below).** These commitments, along with urban sites, are expected to provide Paignton’s housing supply for at least 10 years from the Plan’s adoption.  The Council owned former waste site at Claylands is being promoted for development by the Torbay Development Agency and expected to deliver around 6.8 hectares of employment land early in the Plan period.  | **Clarify the status of Great Parks, should build out times be longer than anticipated.**  |
| 5.2.2.5 | Add to end of paragraph: **For example redevelopments in the area should consider opportunities for habitat enhancements, such as planting to provide bat and wildlife links through the area.**  | Natural England  |
| 5.2.2.7 | Great Parks Country Park add: **which should be designed and landscaped to minimise flood risk** | Environment Agency  |
| 5.2.2.10 | From line 4 amend as follows: ~~although mixed use residential schemes will be supported subject to other Local plan Considerations.~~ **However the Local Plan promotes them for mixed use development comprising a significant element of residential development to assist in the short to medium term supply of housing. As a broad guide, around 25% of the former Nortel site and a third 33% of the Yalberton Road (Jackson Land) will be sought for employment uses and 75% for residential** …strategic landscaping (as existing toend of paragraph)add:  **and early delivery will be supported, subject to other Local Plan considerations.**  | Devonshire Park  |
| Table 5.12 | SDP3.3 last line: brownfield land **will be promoted** in the shorter term.SDP 3.4 add note: ~~that:~~ **The** **former Nortel site is within Policy SDP3.4**. **Early delivery of brownfield sites such as this ~~former Nortel~~ will be supported.**  | Devonshire Park (Editorial clarification) |
| **SDP4**  | Test added at end of paragraph 2 deleted (i.e. return to Proposed Submission text). **~~Development of the area should:~~**1. **~~Provide and maintain landscape buffers between development and areas of semi-natural vegetation in the valley, in accordance with Policy NC1~~**
2. **~~Minimise light spill, particulatly where this would interfere with greater horseshoe bat habitats or flight paths~~**
3. **~~Mitigate for the loss of potential foraging and commuting habitat to ensure retention of connectivity along the valley; retention, where appropriate, of features through development that are likely to be used by greater horseshoe bats. Developer contributions will be sought towards the provision of bespoke purpose-built roosts in appropriate locations along the valley.~~**
 | **Natural England seek deletion of this additional text** |
| **SDB1**  | Paragraph 2 penultimate line greater horseshoe bat **and cirl buntings** can be~~addressed~~ **safeguarded. SDB1**: second paragraph after Greater Horseshoe Bat add **and cirl buntings can be ~~addressed~~ safeguarded. Greater horseshoe bat mitigation objectives for Fishcombe Cove and Wall Park Future Growth Area should be implemented as recommended by the HRA Site Appraisal Report of Torbay Local Plan Strategic Delivery Areas (Proposed Submission Plan) 2014.****Mitigation measures for the wider SDB1 strategic delivery area include:*** 1. **protection and management of existing trees**
	2. **retention of former hedge lines; managed as part of the development**
	3. **no increase in lighting in bat flyways to greater than 0.5 lux.**
 | Natural England/HRA/ RSPB at Draft, Churston, Galmpton and Broadsands Community Partnership. **Natural England**  |
| 5.3.1 | **New paragraph (formerly added to SDB3 as a Suggested Change). The Recreational Impacts on Berry Head - additional HRA work for the Torbay Local Plan by Footprint Ecology (2014), has identified that the level of growth proposed by the Local Plan could realistically increase the recreational pressure on Berry Head to Sharkham Point component of South Hams SAC.** **The data available suggests that there is a zone of influence of approximately 5km driving distance (roughly equivalent to development in the SDB1 Brixham Peninsula. The report recommends a number of mitigation measures. The following measures need to be implemented to ensure the integrity of the SAC is not compromised as a result of increases in recreational pressure:**1. **the development of a detailed management plan addressing habitat management and visitor use;**
2. **habitat management required to increase the resilience of the site over and above that already required to maintain the interest features of the site;**
3. **increased visitor engagement work;**

**~~(iv) management work at Sharkham Point to provide an alternative location for dog-walkers if visitor work suggests this may be effective.~~** | **Natural England**  |
| 5.3.2  | **Regard should be had to the conservation or enhancement of the built, natural and historic environment, particularly within conservation areas, in accordance with other policies in this plan** | Natural England/ RSPB at Draft |
| 5.3.4 | First line, amend to read: reduce reliance on the private car **and rat running,** given…  | Stoke Gabriel PC and others.  |
| Table 5.14 | SDB3.1 and SDB3.2 (Wall Park) benefits from development of larger area…**including the enhancement and safeguarding of AONB and biodiversity features, particularly for greater horseshoe bats.** | South Devon AONB Unit |
|  |  |  |
| **SDB3**  | **SDB3** Add after South Hams SAC in second paragraph: **“…Adequate mitigations should be provided, in accordance with the HRA Site Appraisal Report (2014), that ensure:****(i) there are no further restrictions on potential movement of GHBs along the strategic flyway through the future growth area; and** **(ii) the retention and enhancement of foraging and on-site roosting opportunities.** | **SDB3**  |
|  |  |  |
| 5.3.2.1 |  (SDB3) add aftersensitive locations: **including drawing back development from the AONB in the most sensitive areas.** All development will be expected to conserve and enhance the undeveloped coastarea **and maintain or enhance a coastal margin.** **Add a new paragraph after 5.3.2.1:** **"The Recreational Impacts on Berry Head - additional HRA work for the Torbay Local Plan by Footprint Ecology (2014), has confirmed that the level of growth proposed by the Local Plan would increase the recreational pressure on Berry Head component of South Hams SAC. The evidence has also recommended a number of mitigation measures. These measures need to be implemented to ensure the integrity of the SAC is not compromised as a result of increases in recreational pressure.**1. **the development of a detailed management plan addressing habitat management and visitor use;**
2. **habitat management required to increase the resilience of the site over and above that already required to maintain the interest features of the site;**
3. **increased visitor engagement work;**
4. **management work at Sharkham Point to provide an alternative location for dog-walkers if visitor work suggests this may be effective."**
 | South Devon AONB Unit, Natural England Recreational Impact on Berry Head Report: |
| 5.3.2.2  | add at end of paragraph “**…, including flight paths of greater horseshoe bats. Consideration should be given to the long term integrity of habitats, flight paths and foraging areas, taking into account climate change management (see Policies NC1 and C3)**  | South Devon AONB Unit, Natural England |
| Table 5.17  | Village Envelope, **or built up area of Brixham**  | Northern Trust (editorial clarification).  |
| Table 5.18 | Note on Wall Park relates to SDB3.2 | Northern Trust (editorial clarification). |
| 6.1.1.1 | Add after second sentence: **It will also support the role of towns providing a range of other activities such as theatres, galleries etc.**  | Torquay Town Centre Community Partnership and Theatres Trust |
| 6.1.1.2  | First line add: Tourist, **cultural** and leisure retail provision  | As above  |
| 6.1.1.3 | Add: **All town centres contain historic elements, and Policy TC1, in conjunction with the area policies (SDT, SDP, SDT) and Policy HE1 seek to** **make use of the historic environment to add value to the economy.**  | English Heritage  |
| **TC2**  | Retail Hierarchy table add: **18.Great Parks (when completed) and 19. White Rock (when completed)** to Local centres in the Paignton Area.  | Abacus Properties and Deeley Freed |
| 6.1.1.6 | Line 2 add: **In addition to the Town Centre BIDs there is a BID for the Babbacombe Bay area.**  | Babbacombe Bay BID |
| **TC3**  | **TC3 (D1) reduce retail impact test threshold trigger from 1000 sq m to 500 sq m.**Proposals for A1 retail comparison goods and town centre uses over ~~1,000~~ 500sq m gross and A1 convenience retail uses over 500 sq m gross must provide a retail impact assessment. | Paignton Neighbourhood Forum and others.  |
| 6.1.1.11 | After “enhancement” in fourth line add: **The Torbay Retail Study Update (GVA 2013) recommends that out of centre proposals of more than 500sq m of convenience or comparison retail floorspace should be accompanied by a retail impact assessment (see paragraph 6.31 and 6.32)**  | Paignton Neighbourhood Forum and others.  |
| 6.1.1.20 | After family friendly appeal add: **For example the Plan supports the provision and enhancement of cultural facilities such as theatres, art galleries etc.** | Theatres Trust  |
| **TO1**  | Replace Green Tourism with **Sustainable Tourism** Revise the last paragraph as follows: Development **within the Brixham Peninsula (SDB1)**should have regard to Policy NC1 concerning the need for developer contributions to mitigate the impact of **increased** recreational pressure on the South Hams SAC. | ERTB HRA/**Natural England**  |
| 6.1.2.3  | Fourth line add: High quality **year round** new facilities  | ERTB |
| 6.1.2.5 | Add to end of paragraph: **In particular proposals for new 4 or 5 star hotels would be supported in order to meet a growing demand (as identified by the Business Forum) for high class accommodation**.  | Torbay Business Forum  |
| 6.1.2.6 | Amend 5th paragraph as follows: It should not be inferred that all areas within CTIAs are either suitable or proposed for development. For example they contain Babbacombe Downs, ~~and~~ the lakes at Clennon Valley, **and coast near to Berry Head ,** where a significant emphasis will be on conservation of the environment,…” | RSPB |
| **TO3** | Line 3 after environmental insert **historic environment** **Add to the end of first paragraph:****Sites of importance to marine based activities will be protected for such use, subject to the other policies in the Plan.**Para 2 amend to: The following schemes~~are proposed~~ **will be investigated**  | Natural England. English Heritage.**Editorial clarification to protect marine economy** |
| 6.1.2.26 | **Add text to end of paragraph:** **Accordingly, sites that are of importance to the marine economy will be safeguarded for such use (see also Policy C2 below).**  |  |
| 6.1.2.27 | Line 3 amend to: including the seabed**, reefs and sea caves.** **Amend second sentence to:** Where harm cannot be avoided by a proposal, **and the public benefit it generates overrides the ecological impact, appropriate compensatory measures ~~should~~ will be sought** | Natural England/ RSPB |
| 6.1.2.28 | Add at start of paragraph: **Projects are promoted subject to their acceptability in terms of environmental impact from physical impacts, contamination, and nontoxic changes (e.g. to salinity, turbulence nutrients, organic matter etc), as well as minimizing the impacts on main wildlife e.g. through piling, noise or other disturbance. Under the Conservation of Habitats and Species Regulations 2010 (as amended), a licence may be required to carry out works affecting marine mammals or their habitats.**  | Natural England |
| 6.1.2.29 | Add: **Torbay has an important maritime history and all three harbours are within conservation areas. Policy HE1 is relevant when considering historic assets.**  | English Heritage |
| **TA2**  | TA2.3 replace “non-car” with **Sustainable**Para 3 amend last line: …where there is an~~unacceptable~~ impact on road safety~~and~~ **or severe impact (including cumulative effects)** on the function and operational safety of the Networks. | Paignton Neighbourhood Forum and others, SW HARP.  |
| **TA3** | First line add: …car, **commercial vehicle** and cycle parking… | Paignton Neighbourhood Forum and others |
| **C1** | Para 3 add bullet point (after 1): **or self build affordable housing where acceptable under Policy H3**Last paragraph: Where new development proposals come forward, the Council will also have regard to the need to protect, conserve or enhance the distinctive landscape characteristics and visual quality of a particular location, as identified in the Torbay Landscape Character Area Assessment, the suitability of development and the capacity of the countryside to accommodate change. Development in the countryside should not have adverse effect on the integrity of the South Hams SAC **or other important habitats**. It should also have regard to Policy NC1 **to assess the ‘in combination’ effects of multiple developments that could affect greater horseshoe bats and the integrity of the South Hams SAC** and the scope for developer contributions to mitigate the impact of **increased** recreational pressure on the South Hams SAC. The Countryside Area is shown on the Policies Map. | SW HARP (editorial clarification) Natural England.  |
| 6.3.1.2 | Bullet 2 add: **and maintain important green wedges.**  | South Hams District Council and others. |
| 6.3.1.4 | Line 1 after countryside add: **country parks**  | Torquay Town Centre Community Partnership and Cockington Chelston and Livermead Community Partnership |
| 6.3.1.6 | After “appropriate” in penultimate line add: **and reflected in the choice of lighting solutions to minimise the impact of light pollution, particularly on greater horseshoe bats (see Policy SS8) and other wildlife**  | Stoke Gabriel Parish Council |
| 6.3.1.8 | Line 3: great visual **and historic** importance. **Add text to end of paragraph**: **Proposals for development will be considered in the context of the Torbay Landscape Character Assessment. This identifies areas of distinctive character and key characteristics to protect, conserve or enhance to help maintain those features which contribute to that distinctive character. It also describes the sensitivity of the landscape to change and potential mitigation and management strategies. The related Brixham Urban Fringe Study uses the LCA as the basis for a more detailed analysis of landscape compartments in the SD AONB surrounding Brixham, providing recommendations for conserving, maintaining and enhancing the integrity of the various designations.** | English Heritage. **Editorial to add clarity**.  |
| 6.3.1.15 | After boat repairing add **(see also Policy TO3 above)** | **Editorial clarification** |
| P112 | Curator **of** Plants… | Typo |
| **C2**  | Line 2 after landscape add: **seascape****Note Policies Map change to include northern strip of land at Broadsands within C2**.  | Churston Galmpton and Broadsands Community Partnership |
| **C3.3**  | Point 1 add: marine ecology and **the integrity of** sites protected under European Legislation…Add after coastal locations in Point 3: **or inhibit the ability to access, maintain and/or improve existing sea defence or coastal management assets.**  | Environment Agency  |
| 6.3.1.21  | Add to last bullet point in 6.3.1.21: Sea defence, flood risk and erosion, **including the safeguarding of development and habitats, including corridors.** Add bullet point: **Some marine works will require an Environmental Impact assessment, as covered in Policy T3. Early engagement with the Marine Management Organisation (MMO) and Natural England is advised.**  | MMO, Natural England, RSPB |
| **C4** | Paragraph 1 line 3 add landscape, **historic o**r nature conservation…Add second paragraph: **Development proposals should seek to retain and protect existing hedgerows, trees and natural landscape features wherever possible, particularly where they serve an important biodiversity role.** | Woodland Trust and others |
| 6.3.1.22 | Delete **can** in first line  | As above.  |
| 6.3.1.24 | Add at end of paragraph: **Established hedges have substantially more historic and environmental value than new hedges, which take time to mature and do not reflect historic enclosure patterns. Therefore existing hedges etc should be retained wherever possible. This is particularly important where they form part of the greater Horseshoe Bat corridors identified in Policy SS8** | As above  |
| 6.3.1.25 | After third sentence add: **Whilst orchards are often not protected by TPOs, and permission is not needed to prune trees grown for the production of fruit, orchards can nevertheless serve a valuable green infrastructure and local heritage role as well as being an excellent form of sustainable food production. On this basis, proposals affecting orchards will be considered on the basis of Policies SS9, C4 and SC4.**  | Stoke Gabriel Parish Plan Group |
| 6.3.1.32 | Delete last sentence and replace with: **The Council will seek to minimise any impact on the ULPA, whilst recognising that Network Rail’s operational and safety standards must be met.** | Network Rail |
| **C5** | ULPA numbers 51-57 are renumbered as a result of printing error ~~review of ULPAs~~ (No change to sites designated or Policy wording). |  |
| **Policy NC1** | **Policy NC1** **Biodiversity and geodiversity** **Development in all areas** The Local Plan seeks to conserve and enhance Torbay’s biodiversity and geodiversity, through the protection and improvement of the terrestrial and marine environments and fauna and flora, commensurate to their importance.  The promotion, improvement and appropriate management of Torbay’s special environmental and geological qualities, and corridors between them, will be supported and will be a key element in promoting sustainable tourism and fostering pride in the area’s unique environment.  Development should not result in the loss or deterioration of irreplaceable habitats **or corridors.** Where development in sensitive locations cannot be located elsewhere, the biodiversity and geodiversity of areas will be conserved and enhanced through planning conditions or obligations. Development proposals should minimise fragmentation, and maximise opportunities for the restoration and enhancement of natural habitats, including trees and ancient woodlands. The integrity of wildlife corridors  and important features shown in the Torbay Green Infrastructure Delivery Plan should be ~~preserved~~ **conserved** and enhanced. All developments should positively incorporate and promote biodiversity features, proportionate to their scale. Where there is an identified residual impact on biodiversity, proposals will be expected to deliver a net gain in biodiversity through the creation **or provision** and management of new **or existing** habitats, in accordance with the Torbay Biodiversity and Geodiversity Action Plan and the Torbay Green Infrastructure Delivery Plan.  If avoidance and mitigation are not sufficient, residual impacts must be off-set in a manner deemed acceptable by the Council. **Internationally important sites and species**Internationally ~~or nationally~~ important sites and species will be protected. **Avoidance of likely significant effects should be the first option.** Development likely to affect an international site will be subject to assessment under the Habitat Regulations and will not be permitted unless adverse effects can be fully mitigated. **In addition, development likely to have a significant effect on the integrity of the South Hams SAC will be required to provide biodiversity conservation measures that contribute to the overall enhancement of greater horseshoe bat habitats.****Development around the edge of the built up area that is within the Berry Head SAC Sustenance Zone or likely to affect strategic flyways of greater horseshoe bats will as appropriate be required protect existing hedgerows (including remnant hedges and veteran trees) that surveys show are being used as bat flyways and enhance the exiting flyways by**  **providing features, such as linear corridors of hedgerows, to maintain and improve the ecological coherence of the landscape necessary to maintain the Torbay population of greater horseshoe bats in ‘favourable conservation status’. This will include maintaining lighting levels at 0.5 lux.**Developer contributions will be sought from **development within the Brixham Peninsula (i.e. SDB1) towards** measures needed to manage increased recreational pressure on the South Hams SAC resulting fromincreased housing numbers or **visitor pressure**.**Development that risks harm to cirl bunting habitats and territories will only be permitted where the benefits of development clearly outweigh the impacts, including in combination effects, and the impacts can be mitigated in full. Developers will be expected to provide mitigation on site, where practicable.** **Nationally important Sites and species** **Development on or likely to have an adverse effect on sites of nationally important sites, such as Sites of Special Scientific Interest, will only be permitted in exceptional circumstances where the following can be met:**1. **The benefits from development outweigh the impacts on the site and broader nature conservation interests; and**
2. **Nature conservation impacts can be fully mitigated/compensated.**

Consideration should be had to the cumulative impacts of developments. Development likely to **cause** harm to such sites or species **that cannot be mitigated as above** will therefore only be permitted where there is an overriding public interest considered to outweigh the impact(s) on nature conservation, where a thorough assessment of impacts (both individually and in combination with other developments) has been undertaken, and where consideration has been given to reasonable alternative sites for development~~.~~ ~~In the circumstances where~~ **~~there is an overriding public interest that renders~~** ~~development is acceptable, schemes should minimise damage to nature conservation interests and provide appropriate mitigation, compensation and/or enhancement to achieve a net gain for biodiversity.  If significant harm cannot be avoided, planning permission will be refused.~~ **Locally Important Sites and species** Development in locally important sites will only be permitted where there are no reasonable alternative sites, where the reasons for development clearly outweigh damage to nature conservation interests, where every effort has been made to minimise any such damage, and where appropriate mitigation and compensation measures can be put in place.  | Natural England, RSPB, Churston Galmpton and Broadsands Community Partnership, South Devon AONB Unit and others. **Further Policy amendments and re-ordering in response to Natural England/HRA** |
| 6.3.2.1 | **Add to start of paragraph**:**The NPPF requires local plans to identify and map sites of international, national and local importance; and to avoid harm where possible, followed by mitigation of impacts, and then compensation for harm as a last resort.**   | **Natural England**  |
| 6.3.2.2 | Further amendments as follows: The habitats of the SAC are susceptible to degradation through scrub invasion, erosion by walkers and eutrophication through dog fouling. ~~The Berry Head Conservation Management Plan 2007 - 2017 recognises that declines in calcareous grassland appear to indicate that current visitor numbers are in excess of the carrying capacity.~~ **~~The HRA of the Local Plan, as well as a subsequent, more detailed report by consultants Footprint Ecology, identifies that~~** ~~the increase in housing numbers, and therefore residents, identified within this plan has the potential to increase recreational pressure on the SAC.~~ **~~Footprint Ecology recommends the following potential mitigation measures to mitigate the effects of increased recreational pressure:~~****~~• The development of a detailed management plan addressing habitat management and visitor use; Habitat management required to increase the resilience of the site over and above that already required to maintain the interest features of the site;~~****~~• Increased visitor engagement work; and~~****~~• Management work at Sharkham Point to provide an alternative location for dog-walkers if visitor surveys suggest this may be effective.~~****A report by Footprint Ecology (2014)** **Recreational Impacts on Berry Head – Additional HRA Work for the Torbay Local Plan, identified that there is evidence to suggest that additional impacts on the Berry Head to Sharkham Point component of the SAC, arising from the level of growth proposed by the Local Plan, are a realistic possibility. The data available suggests that there is a zone of influence of approximately 5km driving distance (roughly equal to Policy area SDB1, Brixham Peninsula). The report concluded that the possibility of significant effects cannot be ruled out and mitigation measures will be necessary. The potential mitigation measures identified include:** **(i) the development of a detailed management plan addressing habitat management and visitor use;****(ii) habitat management required to increase the resilience of the site over and above that already required to maintain the interest features of the site; and****(iii) increased visitor engagement work.**Further work will be undertaken by the Council, and associated stakeholders, to further develop and provide estimated costs for the potential mitigation measures identified **by the Footprint Ecology report to mitigate increased recreational pressure on the South Hams SAC within the SDB1 policy area. The Council will produce a Supplementary Planning Document to set out the evidence base, proposed zone of influence, mitigation costs and approach for securing developer contributions.** **~~The Council will develop a strategy for securing developer contributions (through either Community Infrastructure Levy or Section 106 obligations) to fund the specific measures identified as being necessary to mitigate increased recreational pressure on the SAC resulting from increased housing numbers.~~****~~In accordance with this,~~** **Pursuant to this** **development within the Brixham Peninsula (i.e SDB1) will be ~~assessed at project level,~~ proportionate to the scale and nature of the proposal to determine whether there is potential to cause additional recreational impact. Where potential impacts are identified, appropriate mitigation, will be required to ensure that there will be no advisers impact on the South Hams SAC. Mitigation is likely to include habitat management and visitor engagement work.** ~~Developer contributions to fund the mitigation measures needed to manage the increased recreational pressure on the SAC resulting from increased housing numbers will be sought.~~  | As above. Green Infrastructure Coordinator **Further amendments in response to Natural England.** |
| 6.3.2.3 | ~~Add~~ Line 8, after “the sites themselves” add: **In relation to greater horseshoe bats, Policy SS8 is consistent with Regulation 39 of the Habitat and Species Regulations (2010) and with Natural England’s High Level Conservation Objectives for the South Hams SAC.** **It aims to maintain the GHB population at favourable conservation status (which is a requirement of the South Hams SAC conservation objectives), and favourable conservation status is defined in the Habitats Directive. The criteria in paragraph 3 of Policy NC1 are intended to address and mitigate the in-combination effects of development**. Natural England has produced the South Hams SAC Greater Horseshoe Bat Consultation Zone Planning Guidance and Map. This guidance should be followed where a proposed development is located within a greater horseshoe bat sustenance zone or strategic flyway as identified within the Guidance. **This includes the requirement for full bat surveys to be carried out between April and October.**~~Replacement~~  **Additional** guidance has now been prepared by Kestrel Wildlife Ltd, entitled 'Strategic Mitigation Strategy for the South Hams Greater Horseshoe Bat SAC', on behalf of the five South Hams SAC local planning authorities. Certain developments (such as building mounted wind turbines) which normally proceed as permitted development may require the LPA and English Nature to ascertain if the integrity of the SAC may be adversely affected. **Further additional evidence for the Local Plan ~~addendum to this~~ has been prepared by Kestrel Wildlife Limited, specifically to advise on the implementation of the Local Plan “~~Traffic Light Report of Future Growth Areas”.~~ HRA Site Appraisal Report. This provides guidance on likely favourable buffers, and account should be had to this guidance in the implementation of Policy NC1**.• **The maintenance of GHB habitat connectivity across the landscape;**• **The provision of adequate foraging habitat;**• **The provision, where appropriate, of adequate permeability through built development following existing and new flight paths; and**• **The provision of new bespoke roosts where they will provide ‘stepping stones’ across the landscape.**The council and its partner agencies such as the Torbay Coast and Countryside Trust will monitor and review likely **in combination’ effects of multiple developments that could affect the bats biodiversity and the integrity of habitats, particularly the South Hams SAC. Where appropriate developer contributions will be sought towards mitigating these effects.**  | As above. (N.B consider splitting this paragraph up into small paragraphs). **Further amendments in response to Natural England** |
| 6.3.2.4 |  Add second sentence: **As noted above, the Local Plan seeks to maintain and enhance a bat friendly corridor around the rural edge to link roosts and foraging areas within the South Hams SAC.**  | Natural England  |
| 6.3.2.5 | Add new paragraph at end of 6.3.2.5: **The Torbay Biodiversity Action Plan 2006-2016, “The nature of Torbay” sets out key objectives and actions for protecting and enhancing priority habitats and species. Regard should be had to these when considering biodiversity offsetting. Supplementary Planning Guidance will be produced to set out how biodiversity offsetting will operate, and where appropriate how planning contributions towards biodiversity will be used.** | RSPB |
| 6.3.2.7 | **Add to end of paragraph:** **The Local Plan requires development to minimise the impact on sewer outfalls, particularly at Hopes Nose, Torquay. In particular the provision of sustainable urban drainage and water sensitive urban design is promoted by Policies ER1 Flood risk, ER2 Water management and W5 Waste water disposal.** | **Natural England**  |
| 6.3.2.10 | **The Council supports the RSPB’s aspiration for an average provision of 1 new bird or bat box per new dwelling. Supplementary guidance will be produced on maximizing opportunities for wildlife features in design and landscaping.** | RSPB |
| **HE1**  | Move Policy and Explanation 6.3.3.1-16 to become a Strategic Policy (after SS8).Delete **“seek to”** in first line.Add text at end of 6.3.3.11 (HE1) to refer to the Heritage Strategy: **The Torbay Heritage Strategy was adopted in 2011. Its purpose is:** * **to develop a strategy that will help maintain the local and community identity**
* **to be mindful and respectful of the things that make Torbay a special place**
* **to contribute to the quality of life for residents and the community**
* **to initiate conservation-led regeneration to maintain geographical and historical character**
* **to restore original and sentimental character to heritage assets**
* **to encourage an already thriving tourist economy**.

**Policies SS8 and C3 which are relevant to natural features and naturalised manmade features (such as hedgerows, old buildings) of historic and landscape significance.**  | English Heritage  |
| 6.3.3.17 | Add text: **Torbay has 864 listed buildings, so it is likely that a significant number of proposals will arise in the Plan period affecting them. Many are also within conservation areas. Guidance on these and other matters such as Historic Parks and Gardens is set out in Policy HE1 (moved to SS-).** | English Heritage  |
| 6.1.4.17 | End of paragraph add: **and brownfield sites of 15 or more dwellings. It is noted that the government is considering introducing a minimum threshold for affordable housing of 10 dwellings. If this comes into effect the 3-10 dwelling threshold for affordable housing will drop away.**  | Home Builders Federation and others |
| 6.4.1.9 | After first sentence add:  **Developments should be “tenure neutral” as far as practicable, so that affordable housing is not distinguishable from market housing by layout, design or materials.** | Stoke Gabriel Low-E Group |
| 6.4.1.15 | Add: **In considering viability matters, regard will be had to best practice, particularly as set out in National Planning Practice Guidance (NPPG)** | Taylor Wimpey and Others |
| **H3**  | H3.2 delete “at least 12 months” and replace with **a reasonable period** | SW HARP. Add flexibility to policy |
| 6.4.1.19  | Add new paragraph after 6.4.1.19 referring to evidence of demand for self build housing: **In line with NPPF requirements, Torbay Council has made attempts to assess the demand for self-build housing within Torbay. An assessment from the Buildstore, the UK’s leading supplier to the self build market, indicated a ‘reasonable interest’ in self build within the Torbay area with significant numbers of their customers searching for self-build plots within a 25 mile radius of Torbay and also a significant number of members currently living within the Torbay area. In the first half of 2013 there were 121 active searches for self build opportunities within a 25 mile radius of Torbay. In addition, the Council has had discussions with a Community Interest Company called the Land Society, based in Torbay, who have carried out work to assess the demand for community self build housing in the area. Due to sufficient demand (e.g. 36 willing households are on the database for Brixham alone,), they are currently investigating the potential for schemes both within and outside Torbay.**  | Homes and Communities Agency  |
| 6.4.1.24 |  At end of paragraph, add: **This will address matters such as how long plots need to be marketed before they may “cascade” as other forms of housing – 12 months will be used as a starting point. In addition, where self build plots are secured on rural exceptions sites or as affordable housing, planning conditions will be used to restrict occupancy to people with a local connection. The operation of this will also be addressed in further guidance.**  | Homes and Communities Agency/ editorial clarification.  |
| 6.4.1.31 | **Add cross reference to Policy SS10**  | **Editorial clarification** |
| 6.4.1.43 | **Add to end of paragraph:****Regard should be had to the design policies in the Local Plan with regards to the sympathetic conversion of such buildings, particularly the removal or improvement of unsightly features and additions**. | **Editorial clarification** |
| **H4** | Editorial correction. Add after first line: **Applications for new buildings or sub-division of existing buildings into non-self contained residential accommodation (HMOs) will only be permitted where the following criteria are met:**  | Editorial Correction. Paignton Neighbourhood Forum and others.  |
| **DE1** | End of first paragraph, add: **,whilst designing out opportunities for crime and disorder**Design Considerations for Development - Function4. Add to end of criteria 4: **Design should also minimise opportunities for community conflict, anti-social behavior and maximise safety for all.** 7. Integration of the development and surrounding green infrastructure, **including sustainable drainage and water sensitive urban design.**8. Add to end of criteria 8. …**including tree and hedgerow planting and habitat creation.****10. Add new criterion 10. Promote tenure neutral design, materials and location of affordable housing.** Design Considerations for Development - Quality of Public Space.Add new criterion: **Provide opportunities for active lifestyles including walking and cycling (“Active Design”)** | Police Architectural Liaison Officer Woodland TrustStoke Gabriel Low E Group **Natural England** Sport England  |
| 6.4.2.4 | Add new text: **Section 17 of the Crime and Disorder Act makes a legal duty for planning to consider crime prevention. Consideration should be given in the location, design, and management of development to preventing crime, disorder, community conflict and antisocial behavior. Such matters should be addressed in design and access statements. The Council will work with the Police Architectural Liaison Officer (ALO) to minimise crime, disorder antisocial behaviour and conflict. Design should seek to promote healthy and active lifestyles and guidance on “Active Design” is available from Sport England.**  | Police Architectural Liaison Officer Sport England |
| 6.4.2.5 | At end of first sentence add: **proportionate to the scale of the proposal.** | Home Builders Federation and Others |
| **Policy DE3** | 7. Provision for **useable** amenity space, including gardens and outdoor amenity areas; | **Editorial clarification**  |
| 6.4.2.10 | Add at start of 6.4.2.10: **The Government is expected to introduce mandatory housing standards in response to its Housing Standards Review. These will replace the guideline standards set out in the Explanation to this Policy.**  | Home Builders Federation and Others |
| 6.4.2.13 | All square metre area measurements should read Sq m (or M^2 ) and not metres squared (M2 ) | Editorial Clarification |
| Table 6.1  | Add footnote: **This will need to be amended in line with proposed mandatory housing space standard when introduced**. All square metre area measurements should read Sq m (or M^2 ) and not metres squared (M2 ) | Home Builders Federation and Others |
| 6.4.2.19 | End of paragraph add: **However, in some instances landscape or ecology considerations may dictate lower densities.**  | Paignton Neighbourhoood Forum and others |
| **DE5**  | Add criteria 6.  **No net additional surface water should drain into shared sewers.**  | Hydraulic Modelling, in response to objections on the grounds of sewer capacity.  |
| 6.4.2.30 | **The impact of “urban creep” (i.e. building over gardens etc) is identified by the Torbay Hydraulic Modelling of sewer Capacity study (AECOM 2014) is identified as having a greater impact on sewer capacity than the effect of new greenfield development. Accordingly measures to minimise surface water running into shared sewers will be sought. This could include permeable surfaces, increased planting, water butts, as well as promoting water efficiency measures in the home. See also Policy ER2 Water Management.**  | As above  |
| 6.4.3.5  | After Green Space in penultimate line add: **Guidance on active design is available from Sport England.**  | Sport England. |
| 6.4.3.7 | **Add to end of paragraph:** **Additional advice on Health Impact Assessments and the relationship between planning and health will be prepared by the Planning and Public Health teams in the form of a supplementary Planning Document.**  | **Editorial cla****rification** |
| **SC2** | Amend three criteria in last paragraph of Policy SC2 to bring in line with NPPF paragraph 74: **i) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or****ii) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or****iii) the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.** | Sport England, Paignton Neighbourhoood Forum.Consistency with NPPF paragraph 74.  |
| 6.4.3.10 | Update last line ….**which were completed in Summer 2014** | Sport England, and editorial updating.  |
| 6.4.3.17 | After schools in line 2 add **South Devon College**Last bullet point add: **(for example South Devon High School).**  | South Devon College |
| **SC4**  | After Grades 1,2,or 3a add (within the parentheses) **and longstanding permanent pasture** | Churston, Galmpton and Broadsands Community Partnership.  |
| 6.4.3.21 | Add at end of paragraph: **For example developers will be encouraged to use employment and skills plans to better establish links between education and employment.**  | South Devon College |
| 6.4.3.24 | Add at penultimate line**: ...**in terms of its **other value to agriculture (e.g. shelter, field size, location etc),** landscape…. | Churston, Galmpton and Broadsands Community Partnership. |
| 6.4.3.25 | At end of paragraph add: **Whilst orchards may also be covered by Policy C4 above, they are an excellent form of sustainable, local and healthy food production.** **The enhancement of orchards will be supported, particularly where this would strengthen the growing of local varieties of fruits.** | Stoke Gabriel Parish Plan Group |
| 6.5.1.6. | **Note that these standards are voluntary but could supplement Building Regulations requirements. The Government is consulting on a range of allowable solutions for off-site carbon reduction measures.**  | Home Builders Federation  |
| **ER1** | Amend paragraph 2, line 6 slightly to say: would not **increase the** risk **of** flooding **to** third parties.  Mitigation measures such as Sustainable Drainage Systems (SUDS), **Water Sensitive Urban Design (WSUD) and water storage areas** will be required to restrict site discharge rates, **alleviate downstream flood risk** and encourage biodiversity.  **Proposals should have regard to the Council’s Local Flood Risk Strategy and comply with the requirements of any subsequent Action Plan. In this context, the Council will produce a Supplementary Planning Document setting out detailed guidance on the use and application of WSUDS and SUDS.****Development that contributes directly to downstream flooding will not be permitted until the appropriate flood protection measures referred to above are put in place. Development which is unable to provide  surface water management measures (where not feasible on-site) will not be permitted until the appropriate measures are provided upstream.Developers will be required to contribute to these works as appropriate (see also Policy SS7 “Infrastructure, phasing and delivery of development”)**Amend third paragraph, after first sentence: **A flood risk assessment will also be required for development close to sea fronts within Flood zone 1 where there may be a risk of flooding due to wave action.** Development of basement accommodation, **including changes of use or basement** parking will not be permitted where there is danger of inundation and consequent risk to life.  | Environment Agency, **Natural England**  |
| 6.5.2.3  | At end of paragraph add:  **It is important to note that coastal frontages may be at risk of flooding from wave action, event where they are mapped as Flood Zone 1. This must be recognized in planning for such areas.** **Insert new text or add New Paragraph):****The Council is currently consulting on the Draft Local Flood Risk Management Strategy. This explains the key flood risks in Torbay, the measures that have already been taken to minimise these risks, and the measures and actions that will need to be taken in order to minimise these risks further. The ensuing Action Plan will be used to inform the medium term plan for flood defence funding in liaison with South West Water. It will allow flood risk management actions to be prioritised and for investment plans to be focused and coordinated. The first Action Plan is due to be produced in 2015.**  | Environment Agency **Natural England**  |
| 6.5.2.6,  | Replace reference to “Technical Guidance to NPPF” to **Planning Practice Guidance** | Environment Agency- editorial update  |
| 6.5.2.12 | Replace reference to “Technical Guidance to NPPF” to **Planning Practice Guidance** | Environment Agency- editorial update |
| 6.5.2.13 | Delete last sentence and replace with: **The whole of Torbay is designated by the Environment Agency as a Critical Drainage Area (CDA). The catchments within Torbay are typically small, steep, and in the most part highly developed in nature. There is also a legacy of culverting (piping) of the watercourse channels which adds to the risk of flooding and as such all new development must deliver a reduction in current rainfall runoff rates. This requirement also applies to Brownfield sites that will have to match the same standards. All off site surface water discharges from new development should mimic Greenfield performance up to a maximum 1 in 10 year discharge. On site, all surface water should be safely managed in conditions up to the 1 in 100 event plus an allowance for climate change. To satisfy the above will require additional water sensitive urban design (WSUD) and water storage areas to be created within the site compared to the normal SUDS design thereby contributing to a reduction in flooding downstream. Policies ER2 Water Management and W5 waste water also promote the use of SuDs and WSUD.** | Environment Agency**Natural England**  |
| 6.5.2.14 | **Add to end of paragraph:****Further details are set out in the emerging Torbay Flood Risk Management Strategy. Supplementary planning Guidance will be prepared setting out how sustainable water management can be incorporated into development and retrofitted into the urban area.**  | **Natural England** |
| 6.5.2.17 | **Add text before last sentence:** **Full details of the measures that will be used to address flood risk will be required at the time a planning application is submitted for developments other than minor developments as defined by the Planning Practice Guidance (broadly commercial extensions of less than 250 sq m foot print, and domestic extensions)** | Paignton Neighbourhood Forum  |
| ER2 | **Policy ER2 Water management** **Add to end of Policy:** **This would include funding to ensure the provision of any necessary additional surface water management schemes.****The Council will prepare supplementary guidance that provides advice on the role of water management in the development process.**  | Natural England  |
| 6.5.2.18 | Add at end of paragraph: **The Council will seek to use development to bring about improvements to bathing waters and marine habitats through the design of development and off site contributions where appropriate.**  | Environment Agency and Natural England |
| 6.5.2.21 | **Add to end of paragraph:****Further details are set out in the emerging Torbay Flood Risk Management Strategy. Supplementary planning Guidance will be prepared setting out how sustainable water management can be incorporated into development nd retrofitted into the urban area.** | **Natural England**  |
| **W5** | Amend Para 3 to say that: …South West Water, **Natural England or the Environment Agency confirm that:**1. Waste water treatment works **or other sewerage infrastructure** serving these developments have insufficient capacity to accommodate development **without increasing the risk of overflows of untreated sewage into the environment; or**
2. There would be an increase in the levels of pollutants likely to have an adverse effect on the integrity of the Lyme Bay and Torbay Marine cSAC, due to insufficient capacity of treatment works **without increasing the risk of overflows of untreated sewage into the environment.**

**Add new penultimate paragraph:** **In addition, development of previously developed land should introduce SUDS to ensure that development schemes do not exacerbate sewer flooding and Combined Sewer Outfall (CSO) spills. In particular, brownfield development that discharges into Hope’s Nose CSO will be expected to deliver WSUDs and / or SUDs as appropriate**.  | Natural England, **later comments in response to Natural England**  |
| **6.5.3.26**  | Much of Torbay has shared sewers, which places additional load on the network, especially as the effects of climate change become more apparent. The Council, in partnership with South West Water commissioned the Assessment of Future Sewer Capacity in Torbay ( AECOM 2014) to consider the deliverability of the Torbay Local Plan within Torbay’s sewer capacity. This confirms that the Local Plan is deliverable within the strategic sewer network’s capacity.  New development should have separate foul and storm water drainage systems. In addition Water Sensitive Urban Design (WSUDs) and Sustainable Urban Drainage (SuDs) is recommended to reduce the impact of climate change and urban creep (hardstandings etc). The Council will support measures to reduce the amount of storm water and grey water (e.g. from run-off, washing or cooking) going into the shared sewer.  Policy ER2 deals with water management in more detail.  | **Natural England , Paignton Neighbourhood Forum, Collaton Defence League and others** |
| 6.5.3.27 | Add paragraph after 6.5.3.27: **It is important that water quality of the Marine Candidate Special Area of Conservation is not harmed by pollutants or outfall in storm events. Natural England is the advisory body with responsibility for such matters. Because of concerns about the capacity of Torbay’s wastewater infrastructure, possible overflows of untreated sewage into the water environment and impact on bathing water quality, all planning applications should be supported by details of how the proposed development will be drained and waste water dealt with. Details should be proportionate to the scale of the proposal.**  | Natural England Environment Agency,Paignton Neighbourhood Forum and others  |
| 6.5.3.28 | At end of paragraph, add: **The Council will seek to ensure no deterioration to and preferably an improvement of bathing waters and marine habitats”.** | As above |
| 6.5.4.9  | Replace “sacle” with **scale**  | Typo |
| 7.4.11 | Fourth bullet point, after infrastructure add: **including green infrastructure** … | Torbay Coast and Countryside Trust |
| 7.4.12 | After s106 Planning Obligations add: **or other requirements** | Home Builders Federation |
| 7.4.16 | At end of first sentence add: **and the future of the NHB scheme** | Editorial clarification.  |
| 7.5.14  | Revise 7.5.14 as follows: **The NPPF requires every effort to be made objectively to identify and then meet housing, business and other development needs in an area, insofar as this does not conflict with other policies in the Framework. Therefore a review of the Local Plan will need to assess need, and whether this can be met within Torbay. It will also need to consider the characteristics of the local housing market area as part of the on-going cooperation with neighbouring authorities. Consideration of these factors may entail an adjustment either upwards or downwards of growth trajectories as part of a refreshed Local Plan.** ~~The Council is aware that~~ Torbay is unusual in that population projections ~~may~~ vary **greatly** depending on migration rates **and assumptions about** economic success. The Housing Requirement Report (PBA 2013) sets out a detailed assessment of housing requirements at 2013. It will be monitored on an annual basis, but a major review will need to be carried out in 5 years. In particular this review will consider:**Evidence of Housing Need and Demand** **Demographic trends:** (including ONS population projections, DCLG household projections, birth rates). Torbay’s population is largely driven by domestic inwards migration and there is evidence that this has fallen in recent years**. In addition, household sizes have remained constant between 2001-11.** **Economic Performance:** (including job creation, unemployment, GVA levels, employment floorspace created, degree of self containment). PBA’s fully assessed housing requirement is based on Torbay’s economy reversing recent trends and performing very successfully over the next 20 years. Whilst Local Plans should be positively prepared, they must also be realistic; and growth forecasts may need revising. The Plan seeks to minimise the need to travel (e.g. avoid excessive commuting levels that could arise if the balance between housing and employment get seriously out of step). **Therefore progress towards improving the quality and quantity of employment in Torbay will be an important consideration when reviewing the Local Plan** **Market and Social Signals:** (including land and house prices, rents and lower quartile affordability [via Land Registry, Annual Survey of Hours and Earnings, local agents], updated Strategic Housing Market Assessment (SHMA), housing related deprivation [via household surveys/Indices of Multiple Deprivation]), **waiting list data, homelessness and concealed households.****Supply factors: Environmental Capacity (i.e. whether need can be met without harming sustainability matters raised in the NPPF)****Land Availability:** Updated SHLAA and Housing Monitor**Housing Monitor:** (including data on completions, commencements and stock of planning permissions) Relevant to both a 5 year rolling supply and longer term trajectory of **developable** sites.**Progress towards providing key infrastructure:** Including, in particular, highway improvements/provision and sewerage capacity. Also progress towards Masterplanning of sustainable communities and progress/funding for necessary and desirable infrastructure.**Evidence of landscape and biodiversity impacts:** (including mitigation and management), **including Biodiversity Action Plan habitats proposed, created or managed. This also includes assessment of off-site impacts such as bathing water quality.**  | Paignton Neighbourhood Forum and others. Natural England, Torbay Coast and Countryside Trust and others.Homebuilders Federation and others.  |
| 7.4.23 | **Masterplanned areas may require an element of cross-subsidy of employment (B space) land by higher value uses, either through equalisation agreements or S106 contributions.** | **Editorial clarification to ensure deliverability.** |
| Table 7.1 | Add to footnote: **and are subject to five yearly reviews of the Local Plan.**  | As above |
|  |  |  |
| Appendix A | Add **Heritage Asset** and **Historic Environment** to Glossary of Terms **Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).****Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed.** | English Heritage |
| Appendix C | Add: **Third Devon Local Aggregate Assessment 2004-2013, First Draft (Devon County Council, May 2014)** to Appendix C.  |  |
| Appendix G | All square metre area measurements should read Sq m (or M^2 ) and not metres squared (M2 ) | Editorial Clarification |