

NTC Schedule of Proposed Modifications to NNP v2

INTRODUCTION

This working document lists modifications to the NNP proposed by NTC. They are set out below in 2 Tables. Proposed modifications are in bold ink in each table.

Table 1: Proposed modifications arising from Examiner's Report and Examination

Notes: Table 1 lists the modifications recommended in the examiner's final report; amendments to supporting text to support and clarify the recommended modified policy text; any new glossary entries required for this. Wherever possible proposed amended supporting text will be based on comments submitted by TDC and NTC during the examination.

Table 2: Proposed additional non-material modifications based on Regulation 16 Consultation responses

Notes: Table 2 lists proposed non-material minor modifications to the supporting text, and other modifications based on Regulation 16 Consultation responses by NTC and TDC.

NTC and TDC will meet and agree joint lists of modifications for Table 1 and Table 2.

Once the joint lists are agreed, these modifications and all other proposed corrections of inconsistencies, removal of repetitions, typographical/grammatical and factual errors in the supporting documentation, updates of information where new information is available (for example on the progress of the Plan towards referendum), or where text must be modified to align with the modifications set out in Table 1 and Table 2; necessary clarifications of wording and information etc. will be made on working documents and denoted in coloured ink for final agreement by TDC and NTC.

Abbreviations

BNG = Biodiversity Net Gain

NPPF = National Planning Policy Framework

NDTLP = North Devon and Torridge Local Plan

NTC = Northam Town Council

TDC = Torridge District Council

References

'recommended by examiner' = Report on the Northam Neighbourhood Plan 2024-2031' date 10th February 2026

'NTC fact check letter' = Letter from NTC to examiner dated 6th February 2026 re: draft Report fact check

Table 1: Proposed Modifications arising from Examiner's Report

Proposed Modification no. (PM)	Proposed Neighbourhood Plan page/paragraph/other reference	Proposed modification	Reason for proposed modification
PM1	Front Cover	Include 2024-2031	To prominently identify plan period on front cover
PM2	Policy CF1 clause 1	Proposals for new the development or change of use of community facilities within the Plan area will be supported where: ...'.	To clarify that the policy should apply to proposals for community development not all development.
PM2	Glossary	Add to the Glossary of the Plan the definition: ' Community value - see Section 88 of the Localism Act 2011. '	To clarify meaning of the term 'community value' in clause 1 i. of policy.
	Policy CF1 supporting text	Supporting text to clarify reference to 'community value' by stating that the phrase refers to Section 88 (1) and (2) of the Localism Act 2011 relating to the circumstances that land and buildings may be considered to possess community value.	For clarification of text. As suggested by TDC in letter to examiner dated 6.2.26 reference FACT/TDC/NNP Point 1
	Policy CF1 supporting text	Amend supporting text to include text as following: 'To demonstrate that a community facility is no longer required for communities and organisations seeking to further the social well-being or social interests of the local community, the local planning authority will expect that applications resulting in a loss of a community	To assist implementation. As suggested by TDC and NTC letters to examiner dated 5.12.25.

		facility to be supported by robust and credible evidence demonstrating no demand for the community facility in the locality. Applicants will be expected to submit detailed information to show that the community facility (premises and/or land) has been marketed, at an appropriate price reflecting the existing or potential community use of the community facility, for a period of 18 months and that there was no legitimate buyer demand for the community facility over that period. The marketing strategy, along with the price at which the community facility will be marketed, should be agreed with the local planning authority prior to commencement of the marketing exercise.'	
		Supporting text to clarify that 'children's play' refers to the provision of children's play space.	For clarification. As noted in TDC letter to examiner dated 5.12.25.
	List of community facilities pp. 17-18 and Appendix 1	Remove list. Amend text of para 6.1 to explain that Appendix 1 provides an indicative list to demonstrate the range of community facilities in the Plan area. Introduce the list in Appendix 1 by making the same point as in para 6.1.	As noted in TDC and NTC letters to examiner dated 5.12.25. for clarity and to obviate any need to map facilities or maintain a comprehensive list.
	Glossary	Add definition of 'community facility' to the glossary of the Plan as 'A building or space accessible to members of the public that provides social, cultural or recreational services: for example, play spaces, public toilets, schools, libraries, local shops, healthcare facilities, places of worship, meeting halls, public houses, sports facilities and public open spaces.	For clarification. As suggested in NTC letter to examiner dated 5.12.25 and TDC letter to examiner dated 5.12.25. Definition largely taken from NDTLP Glossary.

	Policy CF1 supporting text	Amend paragraph 6.1 to remove inference that public houses are owned by charitable bodies.	To correct factual error as suggested in TDC letter to examiner dated 5.12.25.
PM3	Policy HO1 clause 1	The provision of one or two bedroom dwellings will be supported. On developments of more than 10 dwellings, 50 % shall have one or two bedrooms, subject to considerations of viability, site character and context.	To ensure that policy does not harm the viability of a scheme.
PM3	Policy HO1 clause 2	New dwellings will be supported where they are designed to be accessible and adaptable and to cater for the changing needs of occupants over their lifetime. On developments of more than 10 dwellings on sites which are well located in terms of access to social and community facilities, at least a third should be designed to meet Building Regulations Standard M4(2).'	To ensure the viability of schemes and to ensure that policy does not inhibit the delivery of housing.
	Policy HO1 supporting text	Supporting text to be amended to state that meanings of 'viability, site character and context' are as defined in Policy ST17 of NDTLP.	For clarification. As suggested in NTC letter to examiner dated 5.12.25.
Report para 4.12	Policy HO1 supporting text	Amend supporting text to state that the sites considered 'well located' in terms of clause 2 may be identified on a case by case basis especially considering walking or wheeling distance along sound pavement rather than travel times with reference given to current guidance available, such as in the 'National Design Guide'; 'Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure'; and 'Planning for Active Places'.	For clarification and to assist implementation as suggested by examiner report para 4.12 with reference to suggestion by TDC in letter to examiner dated 5.12.25.
Report para 4.14	Supporting text of Policy HO2	Supporting text to include clarification of the use of the term 'Vacant Building Credit'. Amended	As recommended by examiner in para 4.14 in response to

		<p>text to state with regard to the re-use of empty or derelict buildings and land for affordable housing, that Vacant Building Credit may apply on sites of sufficient size for a proportion of affordable dwellings to be required under Local Plan policy. When Vacant Building Credit applies the site should not deliberately be made empty.</p> <p>Amended supporting text to define the phrase 'standard of accommodation' as the standard of accommodation to be provided for affordable dwellings as specified in Section 5 of the NDTLP Affordable Housing Supply Supplementary Planning Document (SPD) Adopted July 2022 although the SPD document will not be cited;</p> <p>Amended supporting text to define the phrase 'low cost home ownership opportunities' as those categories of affordable home ownership tenures defined by Annex 2: Glossary of the NPPF as: 'c) Discounted market sales housing; and d) Other affordable routes to home ownership', and also as used in the NDTLP.</p>	<p>suggestion by TDC in letter to examiner dated 5.12.25 and NTC letter to examiner dated 5.12.25.</p>
	<p>Policy HO2 clause 3</p>	<p>Amend supporting text to clarify that assessment of local need referenced in Policy HO2 Clause 3 relates to identified and evidenced neighbourhood need in the NNP area rather than the Torridge District as a whole.</p>	<p>Clarification, support implementation as suggested in NTC regulation 16 consultation response reference TDC point 31.</p>

PM4	Policy HO3	<p>Residential development will be supported where:</p> <ul style="list-style-type: none"> i private and public amenity space is provided, where appropriate, to ensure usable outdoor space which creates a healthy environment meeting the needs of the occupants; and ii overlooking of neighbouring properties and gardens which would be significantly detrimental to residential amenity is avoided; and iii an increase in height over any replaced building is consistent with the height and form of neighbouring properties, fits unobtrusively with the character of the street scene does not cause significant harm to the character and appearance of the area and safeguards the amenity of residents of adjacent buildings. 	As recommended by examiner to comply with basic conditions, NPPF 135 and NDTLP ST04.
	Policy HO3 supporting text	<p>Amend supporting text to state that: 'The provision of private and public amenity space may not be 'appropriate' where it is not necessary or reasonable —for example, in the case of small residential development; sites where existing public amenity space is readily accessible; or where there is a change of use of an existing building. and this will be determined on a case by case basis taking into account all relevant factors, such as the amount of existing readily accessible public amenity space; and whether the proposed development involves a change of use of an existing building.</p>	Clarification of additional phrase in 'where appropriate' in HO3 i) as suggested in TDC regulation 16 consultation comment (nor 101) point 34 and NTC fact-check letter; modification to support and clarify modification PM4 relating to HO3 ii).
	Policy HO3 supporting text	<p>Amend supporting text to state that: 'A significant proportion of residential development proposals will have some degree of overlooking onto or from existing development. Therefore, a judgement has to be made to</p>	Clarification of additional phrase "significantly detrimental" (to residential amenity) in HO3 ii) as suggested in TDC regulation 16

		the significance of any detrimental impact on residential amenity. Where a proposal does not maintain adequate levels of privacy for neighbouring occupiers or uses it would be considered significantly detrimental to residential amenity.'	consultation comment (nor 101) point 33 and NTC fact-check letter; modification to support and clarify modification PM4 relating to HO3 i). Proposed supporting text modification is in conformity with NDTLP DM01 with regard to the requirement for adequate levels of privacy for neighbouring occupiers or uses.
	Policy HO3 supporting text	Amend supporting text to state that: 'A proposal will be supported where it is considered appropriate and sympathetic to its setting, and in relation to existing buildings and landscape features. However, a replacement building of an inappropriate height that fails to respect its context may cause significant harm to the character and appearance of the area, especially where it has a detrimental effect on a listed building or conservation area.'	Clarification of additional phrase 'significant harm to the character and appearance of the area' in HO3 iii) as suggested in NTC fact-check letter; modification to support and clarify modification PM4 relating to HO3 i). Proposed supporting text modification is in conformity with NDTLP DM04a).
PM5	TR1	1. In designing residential development, priority should be given to encouraging the use of sustainable modes of transport to minimise the need for parking provision. Development will be supported encouraged to provide where residential off-street parking provision, designed to meet the anticipated needs of residents and visitors, which is well integrated and accessible in order to encourage maximum maximise usage.	As recommended by examiner to comply with basic conditions. NDTLP Policies DM04, DM06 and especially DM05 would avoid the need for any parking standards in the NNP. This would enable any parking requirements to take into account the scale of any proposal and the transport context. Amended policy text

		<p>2. Residential off-street parking will be supported where it is based on the following maximum levels per dwelling:</p> <p>1 bedroom dwellings – 1 space</p> <p>2 bedroom dwellings – 2 spaces</p> <p>3 bedroom dwellings – 2 spaces</p> <p>4 bedroom dwellings – 3 spaces</p> <p>Developments of four or more dwellings provide one further car parking space per four dwelling units.</p>	would then be in general conformity with NDTLP ST10.
PM5	Objective of TR1 Also, objective 6 in List of Objectives in section 6.	Reword objective to match amended policy text.	
PM5	Para 7.25	Amend para to better explain how policy works	
PM6	DE1 clause 1	<p>i delivers net zero carbon dwellings and delivers as a minimum Biodiversity Net Gain in accordance with National Policy;</p> <p>(alter numeration of remaining sub-clauses of clause 1 so that that ii) becomes i) and so on. End clause 1 with new sub-clause viii))</p> <p>viii in the case of major developments it will be accompanied by a carbon reduction plan with substantial weight being given to the delivery of net zero carbon buildings.</p>	As recommended by examiner para 4.18.
PM6	DE1 clause 3	<p>3. Residential development will be supported where household refuse storage space is externally accessible from the front of the house refuse collection point and is accessible from the kitchen without having to go through a living room. so that</p>	As recommended by examiner to make waste storage space more accessible for collections; Modifications to Policy DE1 required to generally comply with

		street clutter is avoided and so that occupants can recycle and manage waste without hindrance.	basic conditions, NPPF 112 and 165 and NDTLP policies ST02, ST04, ST05 and ST10.
	Policy DE1 supporting text	<p>Amend supporting text as follows:</p> <p>‘Development proposals should seek to minimise their carbon footprint both during construction and in use. Major developments will be required to produce a carbon reduction plan to indicate how this could be achieved, and the implications for development viability, including consideration of materials, construction methods, design, energy, water, waste management, travel planning and carbon offsetting.</p> <p>The strategic need to reduce carbon emissions is set out in NDAT Local Plan strategic policies ST02, ST03, and ST05. Developments are increasingly carbon efficient as a result of increasing energy efficiency, use of renewable energy and promotion of sustainable transport modes. In order to secure the aim of these Local Plan strategic policies, Policy DE1 seeks to maximise the opportunities for minimising energy use and securing carbon emission reductions in all new developments; and a carbon reduction plan is required for major developments (those for 10 or more dwellings or with 1,000 square metres or more of floor space).’</p>	To support recommendation PM6, to assist implementation as suggested in NTC letter to examiner dated 5.12.25.

	Policy DE1 supporting text	Amend supporting to text to state that 'traditional materials' are rendered or natural stone or brick exteriors with natural slate roofing although artificial slate roofing may be considered acceptable for undesignated buildings. Supporting evidence for the types of traditional materials utilised in the NNP area is found in two documents in the evidence base of the Plan: 'Northam Conservation Area, appraisal by Devon County Council' (1987); and 'Appledore 2003 A Conservation Area appraisal Supplementary Planning Guidance Torridge District Council' (2003). Additional supporting evidence is available in the listing reports of designated buildings in the NNP in the National Heritage List for England (NHLE) on the Historic England website.	To clarify text and support implementation as suggested in NTC letter to examiner dated 5.12.25.
	Policy DE1 supporting text	Amend supporting text to state 'low ecological impact materials and techniques' are re-used and/or recyclable and/or locally sourced materials, together with the traditional building techniques necessary to use and work with these materials.	To clarify text and support implementation as suggested in NTC letter to examiner dated 5.12.25. Definition in conformity to NDTLP policy DM01.
PM7	Policy EN1 & Policy EN1a	Map each Local Green Space and area for open space and recreation at a scale sufficient to identify plot boundaries.	As recommended by examiner to enable effective development management and provide

			sufficient clarity for the various interested parties.
PM8	Policy EN2 Policy EN3	Delete Policies EN2 and EN3 and include as a combined policy denoted Policy EN2: PROTECTING RURAL CHARACTER AND IDENTITY OF SETTLEMENTS ‘Development will be supported within The Local Gap shown in Map N1 in the following circumstances: 1. Where it does not detract from the unspoilt character, appearance and tranquillity of the area; 2. Where it maintains and enhances the separate identities of Appledore, Northam and Westward Ho! and maintains their visual and physical separation; 3. Where it conserves, restores, or increases the extent of traditional hedge banks or hedgerow boundaries where appropriate in order to integrate the development with the rural character of the area; 4. Where it does not significantly harm the setting of Northam Burrows or the South West Coast Path; 5. Where, in appropriate circumstances, it provides safe and convenient access to the development by foot, bicycle, vehicle and public transport; and 6. Where it is required because it cannot reasonably be located outside the Local Gap.	As recommended by examiner and suggested by TDC in letter to examiner dated 5.12.25. Modification will support implementation, prevent policy contradictions and improve clarity to policy text. Although policies EN2 and EN3 have different objectives, the outcomes of the policies would be similar. Combined policies EN2 and EN3 slightly modified to comply with basic conditions, NPPF 124, 187, 189, 193 and 198. and NDTLP policies ST09, ST11 and ST15.
PM8	Map N1	Delete the areas of Greenway Drive, Westward Ho! and the Appledore Shipyard from the green area shown on Map N1. In addition, delete the land south of Windmill Lane to the east of the swimming pool, and the property	As recommended by examiner to reduce ambiguity. (Modification ensures that entire Local Gap is undeveloped coast as defined by

		<p>“Greenacres” along Pitt Hill Lane from the green shaded area shown on the Map N1. (See NDATLP policies maps 8A and B).</p>	<p>NDTLP) and corrects an error in the version of Map N1 where Greenacres’ is incorrectly shown in the green shaded area when it is within the settlement development boundary of Appledore.</p>
	<p>EN2/EN3 supporting text</p>	<p>Amend paragraphs 8.22 and 8.33 as follows:</p> <p>8.22 The NDAT Local Plan identifies almost the entire the area between the settlement development boundaries of Northam/Westward Ho! and Appledore as 'undeveloped' coast within the coastal and estuarine zone. Undeveloped coast is the land within this zone without a significant level of permanent structures. Undeveloped Coast is the land with a predominately undeveloped character situated outside the Developed Coast as defined in the Glossary. Strategic spatial policy ST09 (7) of the NDAT Local Plan states that development will be supported in the undeveloped coast 'where it does not detract from the unspoilt character, appearance and tranquillity of the area ... and it cannot reasonably be located outside the undeveloped coast and estuary.' Also relevant to the area between Northam/Westward Ho! and Appledore is Policy NOR: Spatial vision and development strategy k) which states: 'Development to respect the landscape setting including the adjoining Area of Outstanding Natural Beauty.'</p> <p>8.23 As a spatial policy aimed at protecting the distinctive rural character of the area</p>	<p>To correct error in description of undeveloped coast in EN2/EN3 supporting text. As suggested in NTC letter to examiner dated 5.12.25. Proposed amendment is corrected for consistency with Local Plan and glossary definitions.</p>

		<p>undeveloped coast between Northam/Westward Ho! and Appledore, Policy EN2 supports and complements NDAT Local Plan policies ST09 (7) and NOR k), whilst providing local detail and value on the issues affecting the area between Northam/Westward Ho! and Appledore by adding provision for the protection of the traditional rural boundaries typical of this area. the setting of the South West Coast Path, and safe access to a site by walkers, cyclists and public transport. The latter provision of Policy EN3 has regard to and conforms to the proposals in the LCWIP outlined above and detailed in Appendix 9.</p>	
	EN2/EN3 supporting text	<p>Amend supporting text of EN2 to state: 'Proposals will be supported where they are sensitively located and designed in order to conserve and enhance the setting of Northam Burrows. Proposals that produce significant harm because they clearly detract from the special character and intrinsic beauty of the setting of Northam Burrows or the South West Coast Path will not be supported.'</p>	<p>Clarification of additional word 'significantly' (harm the setting of Northam Burrows or the South West Coast Path) as suggested in NTC fact-check letter; modification to support and clarify modification PM8 relating to EN2 clause 4). Proposed supporting text modification is in conformity with NDTLP policies ST14 Enhancing Environmental Assets (e); and NOR Spatial Vision and Development Strategy k); and NPPF 189</p>
	EN2/EN3 supporting text	<p>Amend supporting text of EN2 to state: 'The provisions of clause 5 are considered appropriate for residential and other forms of development that are intended to be publicly</p>	<p>As suggested in NNP Regulation 16 Consultation response by TDC (reference nor101) point 70, and</p>

		accessible. The provisions of clause 5 are not considered to be appropriate for proposals that do not generate a need for regular access or where specific forms of access such as tractors, or lorries are required. These provisions have regard to and conforms to the proposals in the LCWIP outlined above and detailed in Appendix 9.”	NTC fact-check letter to examiner dated 6.2.26; clarification of additional phrase ‘in appropriate circumstances’ (it provides safe and convenient access to the development etc.) Modification to support implementation and clarify modification PM8 relating to EN2 clause 4). Modification is in conformity with NDTLP policy DM05 Highways (1)
	Policy EN3a	Denote policy EN3: Protecting Dark Skies and Reduce Light Pollution	To implement PM8 Policies EN2/EN3 now denoted EN2.
PM9	Policy EN3a	Delete Policy EN3a and substitute new policy text denoted Policy EN3: Protecting Dark Skies and Reduce Light Pollution Within the area defined on Map N1, proposals for development will be supported where it is demonstrated that, where external lighting is required, it protects the night sky from light pollution.	As recommended by examiner. Clause 1.ii includes details which may be superseded during the period of the Plan as technology improves and standards change. Likely effectiveness of clause 1 renders clause 2 superfluous. Policy modified to generally comply with basic conditions, NPPF 198 and NDTLP ST14.
	Policy EN3a supporting text	Amend supporting text to explain how external lighting can protect the night sky from light pollution using the technical information in the former policy text rewritten in less scientific language to explain the technical terms used in terms of the number of and positioning of lights, use of shielding for brighter lights, use of adaptive controls and avoiding brighter bluish light. Amended supporting text to	To support recommendation PM09 and implementation as set out in NTC fact-check letter to examiner dated 6.2.26; amended text to provide clearer and more detailed guidance for applications on how external lighting can

		reference 'Towards a Dark Sky Standard a lighting guide to protect dark skies from local need to landscape impact' v1.1. (UK Dark Skies Partnership) and its successor documents.	protect night sky from light pollution.
PM10	Policy EN4	elopment will be supported where it does not detract from the character and appearance of the landscape and does not significantly harm the views identified on Map N3 (a) to (g) and detailed in Appendix 5. These viewpoints are:	As recommended by examiner In order to avoid minute changes being unreasonably claimed as 'harm', to comply with basic conditions, NPPF 187 and NDTLP ST09, ST11 and ST15.
	Policy EN4 supporting text	Amend paragraph 8.34 supporting text to state: 'Minute or small-scale changes to a valued view are not considered to cause significant harm. Significant harm to a valued view may be caused by a clearly adverse change that may totally or partially obstructs a valued view, or detracts from its special interest as set out in Appendix 5' . Significant harm to a valued view will be determined on a case by case basis and consider all relevant factors, including how the character of the view would change; the extent to which the view would be obstructed and/or; the adverse impact on the aesthetic, special features or interest of the view as set out in Appendix 5.	To support recommendation PM10 and implementation as set out in NTC fact-check letter to examiner dated 6.2.26; amended text to clarify additional phrase 'significantly harm' (the views identified...) and explain how significant harm to a view may be assessed.
PM11	Policy HE1 clause 1	The non-designated heritage assets listed in the Northam Parish List of Locally Important Heritage Assets (NPLLIHA) have considerable local significance. In accordance with national policy, development proposals should avoid harm to these heritage assets and have regard to their character, important features, setting and relationship with any surrounding buildings or uses. When considering proposals for development which may	As recommended by examiner to comply with basic conditions, NPPF 202 – 203, 207 – 210 and 216 and NDTLP ST15.

		affect a non-designated heritage asset, a balanced judgement has to be made having regard to the scale of any harm or loss and the significance of the asset.	
	Policy HE1 supporting text	Amended paragraph 8.40 to state: 'The heritage assets in the NPLLIHA have been assessed to possess considerable local significance. The scale of any harm or loss to this identified and assessed significance should be included in the balanced judgement required by the NPPF.'	To support recommendation PM11 and clarify the intention and mechanism of modified HE1 clause 1 in-line with the policy objective.
PM12	Policy EN5 clause i	i. if adjacent to or within primary green corridors as defined on Maps N5(a), and N5(b) and N5(c) they maintain and enhance the corridors' function and demonstrate measures to secure connectivity of the corridor, thus supporting continued free movement of species through the site; ii. biodiversity net gain is provided in accordance with national policy, as a minimum of 10% on the site (including that which existed prior to any clearance of the site for development) and including such features as mature trees, hedgerows, hedge banks and areas of woodland. The net gain in biodiversity will be achieved by an agreed, enforceable and monitored Management Plan with the applicant specifying what is to be protected and enhanced;	National policy allows for off-site BNG. As recommended by examiner to comply with basic conditions, NPPF 181, 187, 192 and 193and NDTLP ST14.
PM12	EN5 clause iv	iv. they incorporate Sustainable Drainage Systems (SUDs), where appropriate , to not only minimise flood risk but to increase biodiversity on the site.	Not all development would be likely to require SUDs).
	Appendix 7	Include Map N5(c)	As recommended by examiner, to enable PM12 (reference para 4.30)

PM13	Policy TR2 clause 1	1. Residential Major residential and economic development proposals will be supported on the following basis:	As recommended by examiner. Unreasonable for cycle parking facilities to apply to all development. Modifications to policy to comply with basic conditions, NPPF 89, 96, 109, 111 and 117 and NDTLP ST10.
PM13	Policy TR2 sub-clauses 1ii and iii.	ii. they incorporate public cycle parking facilities where appropriate; iii. dedicated footpaths and cycleways are provided where this would create safer and more convenient routes than pavements and roads that use the easiest practicable gradients and include planting schemes to create attractive routes.	As recommended by examiner. Clause 1.iii deleted because phrases 'safer and more convenient routes' and 'easiest practicable gradients' lack clarity.
	Policy PM13 supporting text	Clause 1 supporting text needs to state that major developments are as defined in the glossary of the NDTLP.	To support recommendation PM13 and implementation as set out in NTC fact-check letter; amended text to clarify phrase 'Major residential and economic development proposals.'
PM14	Policy ED1	1. Within development boundaries economic development will be supported with preference given to brownfield sites. 1. Within development boundaries economic development will be supported in the following order of preference: i) On brownfield sites;	As recommended by examiner to ensure clarity of implementation. Modifications to comply with basic conditions, NDTLP ST11. Clause 3 removed because lacks conformity to NDTLP ST09, DM13; duplicates NDTLP.

		<p>ii) Elsewhere within the development boundary if it has been clearly demonstrated that no brownfield sites are appropriate.'</p> <p>2. Outside development boundaries and the Appledore Maritime Employment Zone, small-scale proposals for business enterprises that require a rural location will be supported providing that: an economic need is demonstrated which benefits the local economy, and which cannot reasonably be met within development boundaries.</p> <p>3. Loss of existing employment uses will only be supported where it can be demonstrated that the existing use is no longer required or viable, and that the premises/site/ business has been actively marketed for at least twelve months at an appropriate market price.</p>	
	Policy ED1 supporting text	Amend supporting text to state that the brownfield sites referenced in the policy text are those sites listed on Torridge District Council Brownfield Land Register.	For clarification and to assist implementation. As suggested in NTC letter to examiner dated 5.12.25.
PM15	Policy TR3 clause 3	3. Proposals for the development or redevelopment of any of any privately owned or controlled car parks within the centres will only be acceptable where they will not result in additional on-street parking or reliance on public car parking provision.	As recommended by examiner to make reference to the redevelopment of any privately owned or controlled car parks; modifications to comply with basic conditions, NPPF 113 and NDTLP ST10.

PM16	Policy ED2 clauses 2 and 3	<p>2. Within the area defined on Map N1 only proposals which provide for extensions the expansion of to existing tourism attractions or tourism accommodation will be supported provided that:</p> <ul style="list-style-type: none"> i they cannot reasonably be located outside the area defined on Map N1; and ii in the case of tourism accommodation, they are for the reuse or conversion of existing buildings; and iii proposals comply with NDAT Local Plan policy DM17. <p>3. Outside the defined settlement development boundaries and the area defined on Map N1, only proposals which provide for extensions to existing tourism attractions or tourism accommodation for small scale tourism attractions or tourism accommodation that respect the rural character of the area will be supported provided that:</p> <ul style="list-style-type: none"> i they cannot reasonably be located within settlement development boundaries; and ii proposals comply with NDAT Local Plan policies DM17 and DM18. 	As recommended by examiner. Substitution of word 'expansion' in clause 2 and modification of clause 3 to overcome the ambiguity in the use of the word 'extensions' . Modifications to comply with basic conditions, NPPF 88 and NDTLP ST09, ST13.
	Policy ED2 supporting text	Amend paragraph 9.17 as follows: '9.17 In the area Local Gap between settlements shaded green on Map N1, Policy ED2 is consistent with and is intended to work alongside policies EN2, and EN3, and EN3a) in supporting proposals for the small-scale expansion, or the rationalisation of existing tourism attractions provided they comply with these policies and NDAT Local Plan Policy ST09. Policy ED2 does not support new-build tourism accommodation development in the area between settlements because neither the Northam	To update supporting text to support recommendation PM16

		Neighbourhood Plan nor the NDAT Local Plan (at paragraph 4.53) regards this area as a sustainable location for such development.'	
	Policy ED2 supporting text	Amend supporting text to state that small-scale economic development is defined in the Glossary of the Plan.	To support implementation and general conformity to NDTLP. As suggested in NTC letter to examiner dated 5.12.25.
	Glossary	Add definition of 'small-scale economic development' from the NDTLP Glossary as follows: 'Development for employment or commercial purposes of a scale not exceeding 250 square metres gross external floor area or a site area of 0.1 hectares.'	To support implementation and general conformity to NDTLP. As suggested in NTC letter to examiner dated 5.12.25.
PM17	Policy ED3	<p>Amend policy heading to POLICY: ED3 APPLEDORE EMPLOYMENT ZONE'</p> <p>1. Proposals for the redevelopment of any part of the zone identified on Map N6 for non-employment uses will not be supported unless such proposals meet all the requirements of policy DM13 of the NDAT Local Plan.</p> <p>2. Within the zone employment development related to maritime industries will be supported, subject to the following being met:</p> <p>Within the employment zone defined on Map N6, employment development will be supported, particularly where it requires a coastal location, subject to the following criteria being met:</p>	<p>As recommended by examiner. Area included in Policy includes residential property, however intention of clause 1 is to support employment development. Providing Map N6 allocates land shown as employment zone, clause 1 is redundant. Accordingly, policy amended to refer to Map N6 and area as 'Appledore employment zone. Preference given to employment development related to maritime industries to support objective of policy. Modifications' to policy comply with basic conditions, NPPF 85-87 and NDTLP policies ST09. ST11.</p>

	Objective of ED3	OBJECTIVE TO SUPPORT PROPOSALS FOR MARITIME-RELATED DEVELOPMENT WITHIN THE APPLEDORE MARITIME EMPLOYMENT ZONE	To support change of name to Appledore Employment Zone in PM17. Minor alterations in NNP and Appendices to make change of name where required.
	Policy ED3 supporting text	Amend paragraphs 9.27 and 9.29 to state that maritime economic development proposals will be particularly supported within the Appledore Economic Zone	To support change of policy wording in PM17.
	Policy ED3 supporting text	Amend paragraph 9.28 to reference NDTLP ST09 clause 2 in support of maritime-related development.	As suggested by TDC letter to examiner dated 5.12.25.

Table 2: Proposed additional non-material modifications based on Regulation 16 Consultation responses

Proposed Additional Modification no. (AM)	Proposed Neighbourhood Plan page/paragraph/other reference	Proposed modification	Reason for proposed modification
AM1	Supporting text Policy HE1 clause 2	Supporting text to clarify that clause 2 refers to harm done to a heritage asset prior to any decision on its future.	Clarification and to support implementation. Modification proposed by consultee nor102.
AM2	Supporting text Policy ED3	Supporting text to state that Appledore Employment Zone extends to include two Mineral Safeguarding Areas in this case relating to minerals infrastructure and transportation. Accordingly, proposals should have regard for policy M2 of the Devon Minerals Plan and seek advice from Devon County Council as the relevant Minerals Planning Authority.	Clarification and to support implementation. Modification proposed by consultee nor119 (Devon County Council).
AM3	Where relevant in Plan and supporting documentation	The phrase 'settlement development boundaries' to be used instead of 'development boundary'	Consistency of terminology; clarification of text. As suggested by TDC (nor101).
AM4	Policy HO2 clause 1	Insert definition of 'infill plot' in Glossary.	To support implementation. As suggested by TDC (nor101). To ensure that gardens are not considered infill plots.
AM5	Policy DE1 supporting text	Amend supporting text to define 'low ecological impact materials and techniques'.	To support implementation. As suggested by TDC (nor101).
AM6	Policy DE1 supporting text	Amend supporting text with reference to DE1 clause vii (now clause vi) that proposals should be supported by an	To support implementation. As suggested by TDC (nor101).

		environmental assessment completed by a suitability qualified specialist.	
AM7	Policy DE2 supporting text	Remove reference to 'clause 3' in paragraph 7.38	To correct error. As suggested by TDC (nor101).
AM8	Policy DE2 supporting text	Amend supporting text to explain that the independent assessment in DE2 clause 2 should be carried out by 'a suitably experience and qualified professional'.	As suggested by TDC (nor101). For compliance with paragraph 16f of the NPPF.
AM9	Policy EN2/EN3 supporting text and elsewhere in Plan and supporting documentation	The phrase 'Local Gap' is applied to the area between Appledore and Northam/Westward Ho! Shaded green on Map N2.	For consistency and clarity; to support examiner recommendation PM8.
AM10	Policy EN2 supporting text	Amend footnote 13 on page 35 to refer to 'North Devon and Torridge JLA Update'.	To correct error. As suggested by TDC (nor101).
AM11	Policy HE1 supporting text	Amend footnote 18 on page 43 to state that Torridge District Council holds a local heritage list.	To update information. As suggested by TDC (nor101).
AM12	Policy HE1 supporting text	Amend paragraph 8.36 to clarify that there are 'approximately 161 listed historic buildings entries' because the entries sometimes cover multiple buildings in one entry. Northam Radar Station should be referred to as 'RAF Northam'. Amend paragraph 8.42, the sentence to read, 'heritage asset based on the selection criteria outlined referred to in paragraph 8.41'	For accuracy and clarity of implementation. For compliance with paragraph 16d of the NPPF. As suggested by TDC (nor101) points 86 and 87.

AM13	Policy EN5 supporting text	Amend supporting text paragraph 8.53 to state that first preference is always that biodiversity net gain should be provided on-site to preserve and enhance the existing species habitats and networks in the local area; nonetheless this is not always possible and national policy allows for other forms of mitigation. In the event that on-site biodiversity gains are not possible, policy EN5 supports biodiversity gains being made to land of the same area and of the same type of biodiversity, geodiversity and habitats.	To comply with national legislation and guidance; with reference to TDC (nor 101) point 91.
AM14	Para 3.6	Amend text to describe additional TDC HRA/SEA consultation requested by examiner in 2025.	To update information in Plan.
AM15	Para 1.6	Amend text to describe briefly the final stages of the Plan as it moves towards being made. New Mayor to sign Plan.	To update information in Plan.
AM16	Paras 4.6-4.8	Amend text to describe briefly the final stages of the Plan as it moves towards being made. As an example, Braunton NP does this quite well in general terms.	To update information in Plan.
AM17	Para 5.6	Appledore Maritime Employment Zone	In-line with PM17
AM18	List of policies in Section 5	Amend list to update Policies EN2 and EN3 as combined under new name; new reference for EN3a) and new name for Policy ED3.	In-line with PM8
AM19	Para 7.1	Amend para to state: 'Subsequently Torridge and North Devon districts have been assessed in having a shortfall in their five year housing land supply. Section 10 of the Plan allows for a review of policies in the Plan either after five years or sooner as set out in paragraph 10.4. This process would enable the Town Council make housing allocations if so required in consultation with Torridge District Council.	To update information in Plan.

AM21	Para 7.4	Amend para to explain more clearly how policy HO1 works.	In-line with PM3
AM22	Paras 8.12-8.26	Editorial work to make supporting text more concise whilst supporting change from EN2 and EN3 as separate policies to EN2 as single policy. Clearly linking supporting text to recommended clauses in EN2.	In-line with PM8
AM23	Para 9.6	Appledore Maritime Employment Zone; amend policy references: EN2, EN3, En3a).	In-line with PM17; PM8, PM9
AM24	Para 9.14 and para 9.17.	Reference 'Local Gap' in relation to the area shaded green on map N1.	In-line with PM8.