

South Hams settlements	1,600	160	900	1,600	160	900
Sub-Region Total	11,100	1,110	4,700	9,050	910	3,190

Detailed Sustainability Objectives. Does the proposed approach...						
Assessment of effect	Relevant baseline information	Will the effect be temporary or permanent?	Justification for assessment, with reference to: <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations Plus recommendations for mitigating negative effects and improving positive effects	High level objective: Improve health		
1.1 Improve health	✓?	The beneficial effects arising				
1.2 Reduce health inequalities	✓	from the development will be ingrained in the Sub-Region for the long term	The proposed distribution of new housing within areas accessible by public transport (particularly within the PUA and Sub-Regional centre) should help avoid the erosion of viability and hence accessibility of healthcare by means other than the car, thereby helping to minimise inequality of access to healthcare. However, whilst the housing extent and distribution provides the potential to realise this benefit, it will only be delivered with supporting healthcare and transport facilities.			
1.3 Promote healthy lifestyles, especially routine daily exercise	✓	The PCT has identified several barriers to increasing activity levels including cost of and distance to facilities	The focus of new housing within the PUA, sub-regional centre, market towns and smaller settlements will contribute to the viability of services and facilities in those existing settlements. Retention of local services should encourage healthy lifestyles since they are more likely to be within walking/cycling distance of residents.			
1.4 Allow for adequate provision of health services (particularly given the high proportion of elderly residents)	✓		Whilst not directly contributing to the provision of health services, the focused approach for accommodating new housing in the Sub-Region should increase the viability of health service provision, particularly in market towns and smaller settlements.			

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<p>The relatively high level of new housing proposed responds to particular priorities identified for the Sub-Region – including a lack of available affordable housing (which has very significant and detrimental implications for sustainability), and the need for regeneration. The proposed delivery of 20,150 new dwellings within the Sub-Region between 2006 and 2026 (of which 7,890 are to be affordable) will have a very substantial impact upon the housing market and housing availability and affordability. The total dwellings proposed slightly exceeds the sustainable approach in the context of existing housing need (based on the housing need surveys), and the lack of affordability of dwellings which will be exacerbated by an overly constrained approach. The likelihood of this positive sustainability effect occurring is high, since it is considered that much residential development will come forward without the need for intervention.</p> <p>Post 2016, the proposed rate of new dwelling provision is somewhat below the demographically implied provision. This might have adverse implications for housing availability in the long term. It is acknowledged, however, that environmental capacity must be respected, and it will not be appropriate or sustainable for the Sub-Regional to support rapid growth indefinitely. Furthermore, if the affordable housing stock can be retained in perpetuity (or if this is not possible due to right to buy/acquire etc, there are mechanisms for recycling of the public subsidy), it will be possible to retain a stock of dwellings for working-</p>	<p>Once the new dwellings have been provided, there will be an increased population (with its associated implications) for the long term</p>	<p>Requirement for new dwellings within the Sub-Region based on a 'predict and provide' (demographically implied) provision: 2006-2016 8,930 dwellings 2016-2026 10,350 dwellings 2006-2026 19,280 dwellings (ONS Mid Year Estimates 2003, cited in Sub-Regional report)</p> <p>Sub-Regional annual housing need, based on Torbay, Teignbridge and South Hams Housing Needs Surveys: Torbay 1,816 Teignbridge (within Sub-Region) 302 South Hams within Sub-Region) 218 Sub-Regional total 2,264 (Sub-Regional report)</p> <p>The draft 2005 Torbay Urban Capacity Study estimates a</p>	<p>✓ ✓</p>	
<p>High level objective 2: Support communities that meet people's needs</p>				

<p>Detailed Sustainability Objectives. Does the proposed approach...</p>			<p>Assessment of effect</p>
		<p>Relevant baseline information</p> <p>contained (ie what the market is likely to deliver) capacity of 4,368 dwellings, assuming medium demand, = 364 dwellings per year arising from PDL 2004-2014 (Sub-Regional report)</p> <p>Tegunbridge DC's emerging LDF considers a range of options for the amount of housing growth to be identified in the Newton Abbot SRC.</p> <p>On the basis of the Structure Plan allocation of 3100 between 2001 and 2016, the supply is made up of 607 completions and 694 future commitments, 694 future brownfield and windfalls, and 1799 residual to be found.</p> <p>There is a shortfall of affordable housing in the Sub-Region. 7% of the housing stock in Torbay and 8.5% in</p>	<p>Will the effect be temporary or permanent?</p> <p>Justification for assessment, with reference to:</p> <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations <p>Plus recommendations for mitigating negative effects and improving positive effects</p> <p>age residents, in particular key workers. The need for and availability of housing supply will need to be kept under review.</p> <p>The sustained delivery (to 2026) of 500 dwellings per annum in Torbay PUA is the element of the Sub-Regional approach most substantially raised above the RFG level. The capacity within the PUA has been endorsed by a housing capacity study (which indicates that approx 364 dwellings per year can be accommodated within previously developed land), thus the provision should help accommodate the housing needs of the Sub-Region without the need for extensive development in areas of highly valued landscape or biodiversity. Rather, the affordable target within Torbay of 30% can make a considerable contribution to the sustainability objective of providing suitable and affordable housing for all, whilst regenerating the existing urban area.</p> <p>Delivery of 270 new dwellings per year in Newton Abbot from 2006-2016 (or which approximately 50% are to be affordable) and 100 per year thereafter to 2026 (or which approximately 35% are to be affordable) is also proposed. This will also make a substantial contribution to meeting the housing needs of the Sub-Region, and alleviating the existing lack of affordable housing. It should be made clear that the sharp decrease in dwelling provision proposed post 2016 should not necessarily result in a sudden arbitrary decrease in the rate of new housing provision at this time. Rather, a more gradual decline should be planned for.</p> <p>Regarding the distribution of new development in Newton Abbot,</p>

<p>Detailed Sustainability Objectives. Does the proposed approach...</p>			<p>Assessment of effect</p> <p>Most of the urban capacity is likely to come from small sites. This affects the ability to provide affordable housing and it is considered essential to adopt lower site size thresholds. (Torbay UA Section 4.4 Submission)</p> <p>In the past not all housing sites met the criteria for justifying the Council seeking affordable housing on them. In particular, the issue of thresholds has precluded many small sites from being considered (Teignbridge LDF Core Strategy Issues and Alternative Options consultation)</p>	<p>Relevant baseline information</p>	<p>Teignbridge is social rented housing, compared to 16% in the South West and 19% in England.</p>
<p>Justification for assessment, with reference to:</p> <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations <p>Plus recommendations for mitigating negative effects and improving positive effects</p>	<p>Teignbridge DC are in the process of preparing an Area Action Plan for the Newton Abbot SRC, and the Issues and Alternatives Options consultation sets out potential combinations of urban regeneration and urban extension. There is a substantial residual requirement once completions and commitments and brownfield capacity are accounted for. However, as emphasised by the RSS, it is important to pursue renaissance of existing urban areas in preference to urban expansion where possible.</p> <p>The proposed focus on the two main centres is not at the detriment of locally arising housing needs elsewhere. Rather, more moderate new residential development is to be accommodated within the market towns and smaller settlements in Teignbridge and South Hams. This will help provide balanced communities within the sub-region, and avoid a situation where the population is split according to ability to afford to live in the smaller settlements.</p> <p>The proposed residential growth within market towns and smaller settlements in South Hams exceeds the RFG provision, whereas the proposed growth in Teignbridge meets or slightly exceeds it until 2016, then reduces it post 2016. These differences are considered to be based upon sound reasoning – with need for affordable housing in South Hams particularly pressing (and a proposed requirement for approximately 66% affordable housing), and particular environmental constraints in Teignbridge limiting the extent of land available for new residential development in the longer term.</p>				

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<p>However, South Hams DC's emerging LDF does not appear to deliver the extent of new dwellings within the Torbay Sub-Region proposed by the Sub-Region's submission. The Core Strategy Preferred Options propose 1,030 dwellings from 2001-2016 for the entire area of South Hams outside of the Plymouth PUA, whereas the Sub-Regional submission proposes 1,600 dwellings from 2001-2016 within the Torbay Sub-Regional area. It will be necessary to ensure compatibility of the Sub-Regional approach with the proposals within the Local Development Documents. However, at this stage the number of new dwellings proposed in the South Hams LDF has to accord with the adopted Devon Structure Plan, which provides for a lower rate of provision. South Hams District Council is currently lobbying for a higher rate of provision. It is recognised, therefore, that the context within which new housing is delivered is subject to the shifting strategic context of the Structure Plan and emerging RSS.</p> <p>The preferred approach will help redress an existing trend of decreasing availability of affordable housing. Torbay's urban capacity study indicates that most urban capacity is likely to come from small sites, which implies a need to adopt low site size thresholds for affordable housing provision. This is supported by Teinbridge DC's Core Strategy Issues and Alternative Options paper which specifies that many housing sites have not qualified for affordable housing provision. The principle of low site size thresholds could usefully be set out in the Sub-Regional approach.</p>			<p>✓</p>	<p>2.2 Give everyone access to</p>

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learning, training, skills and knowledge				
2.3 Reduce crime and fear of crime <i>For example through the use of design initiatives i.e. Safety by Design</i>	0			
2.4 Promote stronger more vibrant communities	✓ ✓	The population in Torbay UA is skewed towards a high proportion of elderly residents, with 23% of the population aged over 65 compared to a national figure of 16%. Torbay UA: 2003 survey indicated a need to provide 1816 units of affordable housing per year over the next five years. Teignbridge DC: House price affordability in 2004 was approximately a third of the average house price in the district. South Hams DC: Proportion of households unable to		By providing substantial new housing within the existing settlements, especially affordable housing, more balanced communities will be encouraged (to redress a current population trend with increasingly skewed towards older residents better able to compete for the limited available housing, especially within the market towns and smaller settlements). Furthermore, the focus of new residential development upon existing settlements will increase the viability of services and facilities, including leisure facilities, which should encourage active citizenship and the development of social networks. It will be important, particularly in the context of the more substantial development proposed with the Torbay PUA and Newton Abbot Sub-Regional centre, to ensure that new development is well integrated with existing communities.

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2.5 Increase access to and participation in cultural activities	✓	purchase in lower quartile - Devon County 67.7%, England 32.5%.		The focus of new residential development upon existing settlements should help retain balanced populations with active citizens to foster and support cultural activity
2.6 Improve resident and visitor access to local services and facilities	✓			Again, the focus of new residential development upon existing settlements will increase the viability of local services and facilities, thereby enhancing resident and visitor access, especially by means other than the car. This effect should be self-reinforcing, such that better used services and facilities are able to offer an increasing range and standard of benefits.
2.7 Provide the required infrastructure and services in line with the rate of population increase	✓?	Public transport provision has tended to lag behind demand from new development in Torbay UA, although Torbay Council is working with local bus companies to address this issue.	Relatively	The extent of new development proposed in the Torbay PUA and Newton Abbot Sub-Regional centre should provide the potential to secure developer contributions for appropriately phased infrastructure, to assist the integration of new development with existing communities. The proposed distribution of residential development should be compatible with the provision of supporting infrastructure by avoiding dispersal of infrastructure needs. The implementation of appropriately phased infrastructure will be dependent upon other elements of the Sub-Regional approach, as well as implementation through LDDs

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3.1 Promote the provision of a range of job opportunities ✓?			The high level of residential growth proposed in the Torbay PUA, and to a lesser extent the Newton Abbot Sub-Regional centre, has the potential to support the development of a range of employment opportunities within the Sub-Region, by helping to regenerate the area and accommodate a diverse and balanced population. However, as regards the likelihood of this effect occurring, the potential will only be realised if the residential development within the Sub-Region is accompanied by proactive measures to secure a range of new employment. This is absolutely fundamental to avoid the emergence of a Sub-Region reliant on larger settlements outside of the Sub-Region for employment, especially Plymouth and Exeter, which could seriously compromise the sustainability of the Sub-Region, and would be difficult to reverse. The Sub-Regional report is quite specific about the proposed extent of new residential development, but the extent of proposed employment development to accompany the new housing is not quantified or differentiated for the various spatial components of the Sub-Region. This is further detailed in the appraisal matrix detailing the sustainability implications (and resulting recommendations) of the 'way ahead and infrastructure requirements'.
3.2 Help everyone afford a comfortable standard of living	✓ House prices are 11 times average incomes in Torbay UA		High house prices currently comprise a barrier to the fulfilment of this sustainability objective. The preferred extent and distribution of housing to be accommodated in the Sub-Region will help alleviate this barrier, such that residents are able to afford a more comfortable standard of living.

High level objective 3: Develop the economy in ways that meet people's needs

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3.3 Reduce poverty and income inequality	✓	House prices are 11 times average incomes in Torbay UA		Increasing the supply of affordable housing will reduce poverty and inequality
3.4 Meet local needs locally	✓			Enhancing the viability of services and employment in smaller settlements should help retain and enhance the availability of needs locally
3.5 Contribute to the regeneration and quality and diversity of the tourism industry	0			
3.6 Harness the economic potential of the coast in a sustainable way	0			
3.7 Reduce vulnerability of the economy to climate change and harness opportunities arising	0			
3.8 Ensure a diversification of the economic base of the sub-region to develop a resilience to the changing economy	0			Whilst not specifically addressed within the Joint Working Party Report, UA's Section 4.4 submission to the Regional Assembly, and in their forthcoming Employment Land Review, Teignbridge DC has also recently undertaken an Employment Land Review.
3.9 Help to maintain the agricultural economy	0			
3.10 Reduce the reliance on seasonal work within the sub-region	0			
3.11 Retain and encourage in-migration of people of working age	✓			The increased availability of housing within the Torbay PUA and Newton Abbot Sub-Regional centre has the potential to considerably

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<i>age</i>				progress this sub objective by providing suitable homes for those of working age, both retaining and attracting working age residents. However, new homes on their own will not be enough to deliver this potential. Torbay PUA and Newton Abbot Sub-Regional centre will only prove attractive to this target population if a high quality living environment is delivered, both in existing and new development. The provision of new dwellings within the market towns and smaller settlements within Teignbridge and South Hams (of which a relatively high proportion are to be affordable) will perhaps play more of a role in retaining local working age residents (rather than attracting significant numbers of new working age residents), such that they no longer have to leave the locality to pursue more affordable living.
3.12 Accommodate the need for growth to reflect the role and function of centres	✓	Long term		The proposed extent of new residential development in Torbay and Newton Abbot appropriately recognise their roles as (respectively) Principal Urban Area and Sub-Regional centre. The proposed growth will help consolidate their functions within the Sub-Region as primary and secondary centres of population, with viable services and facilities, as well as employment opportunities. The residential development proposed within the market towns and local centres in South Hams and Teignbridge is appropriate of a moderate scale, but will still provide potential to consolidate communities with viable services and facilities.
High level objective 4: Provide access to meet people's needs with least damage to communities and the environment				
4.1 Reduce the need/desire to travel by car	✓✓?			By accommodating new dwellings within existing settlements, in a manner which consolidates the settlement hierarchy (PUA, Sub-Regional

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4.2 <i>Improve strategic rail links</i>	✓			<p>The geographic scale of the effect will not be confined to the Sub-Region. It is important the Sub-Region functions effectively within the wider spatial context with respect to reducing travelling by car. The proposed extent and distribution of residential development has the potential to make the Sub-Region more self sufficient with less out-commuting. However, this potential will only be realised if appropriate employment opportunities are secured alongside the residential development. If this were not to be the case, there would be a cumulative increase in the extent of commuting (including by car), as the growing residential population would need to seek work outside the Sub-Region. The crucial need to deliver integrated development including job opportunities is further detailed (with recommendations) in the matrix detailing the appraisal of the 'way ahead and infrastructure' requirements'.</p> <p>centres, market towns, smaller settlements), the viability of an appropriate range of services and facilities will be promoted within those centres. Accordingly, higher order services, including retail, will be promoted within larger settlements, and should be more accessible by public transport. Meanwhile the viability of lower order services will be promoted within walking/cycling distance of residents.</p>
4.3 Help everyone access basic services easily, safely and affordably	✓	Lack of access to services and facilities such as post offices, GP's, food shops and primary	The effects arising from the	<p>Providing dwellings for an increasing population, especially of working age residents, will enhance the viability of better mainline services</p> <p>The focus of new residential development upon existing settlements will increase the viability of local services and facilities, thereby enhancing ease, equality and affordability of access</p>

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4.4 Make public transport, cycling and walking easier and more attractive	✓	schools in many rural areas.	development	Again, the proposed focused distribution of development should encourage public transport, cycling and walking. On its own it will not make them more attractive, however. It will be important to plan both for existing and new development in such a way that it includes provision for walking, cycling and public transport as an attractive option.
High level objective 5: Maintain and improve environ-mental quality and assets				
5.1 Protect and enhance the areas of conservation significance	✓?		Long term	It is not possible to determine details of impacts of the proposed extent and distribution of new dwellings on areas of conservation significance at this stage. However, the approach of focusing new dwellings within existing settlements should help prevent encroachment of development within the countryside. The protection and enhancement of areas of conservation significance will need to be considered in detail during the development of LDDs and site specific proposals.
5.2 Protect and enhance coastal and estuarine habitats	?			
5.3 Minimise habitat fragmentation and provide opportunities for new habitat creation or restoration	?			It is not possible to determine details of impacts of the proposed extent and distribution of new dwellings on valued habitats at this stage. However, the approach of focusing new dwellings within existing settlements should help minimise the potential for habitat encroachment which can result from the cumulative impact of dispersed development. However, it should be remembered that valued habitats can also be found within existing settlements (including brownfield sites), and these should also be afforded protection.

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5.4 Promote the conservation and wise use of land	?			Opportunities associated with the new housing proposed (including developer contributions) should be taken to create or restore habitat.
5.5 Ensure the protection of rare plant species	0			
5.6 Protect and enhance landscape and townscape	✓	More than a third of Torbay residents live in an area ranked within the top 20% in the English Indices of Deprivation rankings for Living Environment Deprivation.		The focus on existing settlements should help prevent the potential for cumulative encroachment of new development within valued landscapes in the countryside. If well designed, the new housing proposed in existing settlements can contribute to the regeneration of townscapes, thereby helping deliver urban renaissance and improve quality of life. Urban cramming should be avoided.
5.7 Maintain and enhance cultural and historical assets	?			
5.8 Reduce vulnerability to flooding, sea level rise (taking account of climate change)	✓	Torbay UA occupies a coastal location already vulnerable to flooding. A rise in sea level may increase conflict between urban areas, farmland and protected areas and sites. There is also the potential for flash flooding from run-off.		The reduced rate of growth post-2016 in Teignbridge DC takes into account environmental constraints including flood risk.

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		Newton Abbot has more serious fluvial flooding constraints, which could restrict land available for development		
6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions	?			By promoting viable communities with access to services, the proposed distribution of new housing should reduce the need to travel by car, thereby reducing emissions. The new housing should be required to include sustainable design measures to enhance energy efficiency.
6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)	?			The new housing should be required to include sustainable design measures to enhance water efficiency.
6.3 Minimise adverse environmental and social impacts of mineral extraction	?			
6.4 Reduce waste not put to any use	0			
6.5 Minimise land, water, air, light, noise, and genetic pollution	?			
Summary and Recommendations				
The proposed approach for housing has the potential to deliver considerable benefits for sustainability. In particular, the sub-regional rate of new housing provision				

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proposed will assist considerably in providing suitable and affordable homes for all, resolving the existing lack of affordable housing, allowing local people to remain within their communities, and attracting new residents to the Sub-Region. The proposed distribution of new housing will also help deliver sustainability for the Sub-Region. In particular, it will support and consolidate the settlement hierarchy of PUA, Sub-Regional centre, market towns, and smaller settlements, with associated benefits for retaining and enhancing the appropriate range of employment, services and facilities for the different sized settlements. Focusing residential development within settlements will also promote a logically functioning Sub-Region, with the focus on Torbay as the PUA, Newton Abbot as the Sub-Regional centre, providing employment and higher order services and facilities for a well-integrated hinterland. However, it should be recognised that there will be no sharp functional boundary between one Sub-Region and another. There will continue to be links with neighbouring Sub-Regions.

Throughout this appraisal, the potential beneficial effects of focusing new housing within existing settlements have been emphasised, particularly in terms of enhancing the viability of accessible employment, services and facilities, reducing the need to travel by car etc. As stated in the draft RSS, it is critical that the new housing proposed should be delivered in a form that supports urban regeneration to focus investment, not urban expansion dissipating its effects. According to the RSS, this will involve concentrating on reusing underused land, urban renaissance, and increasing densities, particularly in Torbay. It is apparent from the Teignbridge LDF (Newton Abbot SRC Area Action Plan, Issues and Alternative Options) that there is likely to be a need for at least some urban extension. The proposed Sub-Regional approach could usefully stipulate the principle of accommodating development in a manner which supports urban renaissance, whilst specifying the likely need for Sub-Regionally significant extensions, such as at Newton Abbot.

No specific changes are proposed to the extent and distribution of housing, since this has the potential to deliver considerable benefits for sustainability, and has been established on the basis of evidence based studies. However, for this approach to deliver its potential sustainability benefits for the Sub-Region, it is crucial that it is supported by the appropriate phased provision of employment and infrastructure. The subsequent matrix details the appraisal of the proposed Sub-Regional 'way ahead and infrastructure requirements'. It is also crucial that aspects such as design for a high quality living environment, energy efficiency, layout to encourage walking and cycling as well as public transport, protection and enhancement of biodiversity and the countryside accompany the residential development. These matters are further considered in the subsequent matrix, and their implementation will need to be considered in detail during the development of LDDs.

It is important to ensure that the proposed Sub-Regional approach is compatible with proposals contained within emerging LDFs. South Hams DC's Core Strategy Preferred Options propose fewer dwellings within the Torbay Sub-Regional area than are set out within the Sub-Regional approach. However, it is acknowledged that this situation has arisen because the emerging LDF for South Hams has to accord with the adopted Structure Plan, and that South Hams District Council are currently lobbying for higher provision in order to address a substantial shortfall of affordable housing.

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<p>Both the Torbay urban capacity study (2005) and the emerging Teignbridge LDF highlight the potential for much residential development to fall below the size threshold for affordable housing requirements. Since the need for affordable housing is so pressing within the Sub-Region, there is likely to be a need to set lower size thresholds, and this approach could usefully be promoted at the Sub-Regional level.</p>				

WAY AHEAD AND INFRASTRUCTURE REQUIREMENTS

Much of the housing development identified in Option 4 is likely to occur without particular intervention. However, there will be a need for infrastructure improvements, particularly to achieve economic regeneration and create sustainable communities.

In particular the following areas are important:

- Improvement to transport infrastructure. Torbay is the only major resort in the country that is not served by a dual carriageway. There is a pressing need for the Kingskerswell Bypass/South Devon Link Road, to improve links with the motorway network. It has been estimated that the Kingskerswell bypass would lead to the creation of 8,000 jobs within 5 years.
- Better rail services from Newton Abbot are needed to improve integration with the Paddington-Penzance mainline. Torbay council is in discussions with rail operators to increase the number of services. Torbay Council is making extensive use of S106 Planning Contributions to improve the bus network
- Provision of Serviced Employment. Table 11 sets out achievable job yield from land allocated within Torbay. There is likely to be a need for gap funding to provide services for the land and help job start ups.
- Affordable Housing. All the Authorities in the sub-region have very high affordable housing needs. Although part of this will be achieved through S106 contributions, there will be a need for Housing Corporation ADP and HIP funding to assist this; particularly increase the supply of rented rather than intermediate housing.
- Economic, social and Cultural Regeneration. There is a pressing need for regeneration and upgrading of the resorts in the Sub-Region. In addition community regeneration and economic diversification will need to be addressed in rural areas.
- Landscape and wildlife protection and enhancement are essential, particularly in nationally and internationally important areas. Careful management of the AONB, coastal areas and rural/urban fringes are critical.

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1.1 Improve health	✓		The 'way ahead' acknowledges the need for social regeneration and this should be taken to include the health of the Sub-Regional population.	Improving housing conditions (with homes built to Housing Corporation Scheme development standards) will reduce housing related health problems and inequalities.			
1.2 Reduce health inequalities	✓		The 'way ahead' seeks to protect and enhance landscape and wildlife, including in rural/urban fringes. Site of importance for landscape and wildlife both in fringe areas and within the settlements themselves can provide multifunctional benefits ('Green Infrastructure') including sites for informal recreation, thereby promoting healthy lifestyles, and this could be specified.	The 'way ahead' refers to social regeneration, but does not establish the need for healthcare facilities as an important component of 'infrastructure' to accompany the residential growth proposed. The need to 'enhance Torbay Health Care Trust's capacity to provide high quality, accessible health care to Torbay and parts of the sub-region within the Trust's remit' is acknowledged by Torbay UA's Section 4.4 Submission, but the principle could usefully be added to the Sub-Regional approach.			
1.3 Promote healthy lifestyles, especially routine daily exercise	✓?	The PCT has identified several barriers to increasing activity levels including cost of and distance to facilities	1.4 Allow for adequate provision of health services (particularly given the high proportion of elderly residents)	High level objective 2: Support communities that meet people's needs			
2.1 Help make suitable housing available and affordable for everyone (To address a significant shortfall of affordable housing in the Sub-Region)	✓	Should be long-term, particularly if affordable housing can be maintained in	Delivery mechanisms for affordable housing are set out. This assists considerably in the progression of the affordable housing element of the Sub-Regional strategy, since it is essential to think beyond aspirations to ensure successful delivery.				

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2.2 Give everyone access to learning, training, skills and knowledge	0	The Sub-Region qualifies for Objective 3 funding (of which one aim is to enhance employment opportunities through lifelong education and training programmes)		The 'way ahead' refers to social regeneration, but does not establish the need for learning facilities as an important component of 'infrastructure' to accompany the residential growth proposed. The need to 'maintain high quality education facilities, particularly tertiary education, geared to the economic needs of the area' is acknowledged by Torbay UA's Section 4.4 Submission, but the principle could usefully be added to the Sub-Regional approach, along with recognition of the potential to draw upon Objective 3 funding.
2.3 Reduce crime and fear of crime For example through the use of design initiatives i.e. Safety by Design	0			
2.4 Promote stronger more vibrant communities	✓			Stronger and more vibrant communities should result from the economic, social and cultural regeneration of the Sub-Region
2.5 Increase access to and participation in cultural activities	✓			The 'way ahead' promotes cultural regeneration
2.6 Improve resident and visitor access to local services and facilities	✓			Economic and social regeneration should help enhance the viability of accessible services. The regeneration and upgrading of the resorts (as promoted by the 'way ahead') will play an important part in delivering

<p>Justification for assessment, with reference to:</p> <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations <p>Plus recommendations for mitigating negative effects and improving positive effects</p>	<p>Will the effect be temporary or permanent?</p>	<p>Relevant baseline information</p>	<p>Assessment of effect</p>	<p>Detailed Sustainability Objectives. Does the proposed approach... increase</p>
<p>The 'way ahead and infrastructure requirements' have been developed in recognition that the housing development proposed must be accompanied by infrastructure improvements if sustainable communities are to be achieved.</p> <p>In particular, the need for serviced employment land is recognised in order to encourage business start ups. Transport improvements are also pursued.</p> <p>However, the need to deliver additional accessible services (including retail, healthcare and learning) appropriately phased with new residential development is not established, nor the potential for 'green infrastructure' to enhance the quality of life in settlements, and this could be addressed in the text.</p> <p>Different infrastructure requirements in different parts of the Sub-Region could also be elaborated.</p>	<p>Relatively short? - The infrastructure will need to be continually updated to reflect social, environmental and economic changes</p>		<p>✓?</p>	<p><i>2.7 Provide the required infrastructure and services in line with the rate of population increase</i></p>
<p>High level objective 3: Develop the economy in ways that meet people's needs</p>				
<p>The Sub-Regional study recognises that securing economic regeneration and new job opportunities for the Sub-Region is a crucial accompaniment for the new housing proposed. According to the Sub-Regional study, "the scale of development being proposed in the Sub-Regional Study Options is sustainable in terms of economic growth, and can therefore be justified in terms of housing needs". The 'way ahead' also recognises that the provision of serviced employment land is integral to the</p>	<p>? It is not easy to predict fluctuations in the Sub-Region: Estimates of Employment in Cambridge Economics</p>	<p>2001 65,500 2004 61,500 2006 62,800 2011 64,600</p>	<p>✓?</p>	<p><i>3.1 Promote the provision of a range of job opportunities</i></p>

<p>Justification for assessment, with reference to:</p> <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations <p>Plus recommendations for mitigating negative effects and improving positive effects</p>	<p>Will the effect be temporary or permanent?</p>	<p>Relevant baseline information</p>	<p>Assessment of effect</p>	<p>Detailed Sustainability Objectives. Does the proposed approach...</p>
<p>economic regeneration of the Sub-Region. The extent of quantification of the need for jobs and employment need seems somewhat limited, however.</p> <p>In recognition that both the extent and distribution of the housing element of the Sub-Regional strategy has been quantified, and the economic element is so integral to the successful regeneration of the area there may be a need for additional detail of the proposed extent and distribution of economic development/redevelopment. No target for job generation is provided, nor any details of the need for additional employment land.</p> <p>Some evidence base concerning the potential for delivery of jobs in Torbay UA has been provided (in the Sub-Regional submission, with further detail provided in Torbay UA's Section 4.4 Submission). It is estimated that there is potential for job creation from existing Local Plan allocations in the order to 840 per year if there is funding or pump priming to enable development (Torbay UA Section 4.4 Submission). If this magnitude of provision is delivered, then the new employment opportunities alongside the proposed 500 additional dwellings per year in the Torbay PUA can provide an integrated, proactive and sustainable approach to regeneration within the PUA.</p> <p>Although Torbay PUA is likely to be the main centre for employment (though this is not clear from the 'way ahead'), there is no indication of the extent of required and available employment land in other areas of the Sub-Region, including in Newton Abbot. Teignbridge DC's Core Strategy (Issues and Alternative Options consultation) sets out different</p>	<p>a trend of economic growth has been established, it should be self-reinforcing, at least in the medium term</p>	<p>2016 66,300 2021 67,400 2026 68,700 Total increase 3,300</p> <p>Torbay assessed the potential to deliver accelerated economic growth on allocated employment sites, small business areas and business investment areas in the Adopted Torbay Local Plan. Total 2005-2011: Low (baseline with no intervention) 910 Medium (some market-led pump priming) 2,600 High (successful intervention) 7,670</p> <p>These figures are an estimate of potential and an important challenge will be to unlock investment</p> <p>The Chelmer model predicts job growth in Torbay of</p>	<p>job growth in Torbay of</p>	

<p>Detailed Sustainability Objectives. Does the proposed approach...</p>			<p>Assessment of effect</p>
		<p>around 6000 over the period 2006-26. The most significant growth is predicted in retailing and health services. This presents a laissez faire position, which extrapolates on recent trends. Since Chelmer model, there has been a significant recovery in the economy. The remains appear to be led by local business start ups, and adds support to Torbay Development Agency's view that the provision of serviced employment units would lead to (home grown) job creation, subject to provision of appropriate infrastructure.</p>	<p>Relevant baseline information</p>
			<p>Will the effect be temporary or permanent?</p>
			<p>Justification for assessment, with reference to:</p> <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations <p>Plus recommendations for mitigating negative effects and improving positive effects</p>

In recognition of the unsustainable outcomes of delivering substantial new residential development in the absence of new employment opportunities (such as exacerbating the ageing population structure), the Sub-Region might wish to consider adding a caveat to make the high level of residential growth proposed subject to the delivery of accompanying employment opportunities – perhaps based on an annual review of new dwellings and new jobs. Indeed, the draft RSS specifies that future development in Newton Abbot should be preceded by increases in economic provision in parallel with additional housing. However, as described in Torbay UA's Section 4.4 submission, substantial residential development will occur through the take up of extant proposals and windfalls on PDL.

The assessment of the potential to deliver accelerated economic growth in Torbay refers to 'successful intervention' in order to realise the high level of growth. The text of the Sub-Regional study highlights availability of EU Objective 2 and Objective 3 Structural Funds programmes, and states that other sources of funding include the National Lottery Fund. However, it would be useful to set out other delivery mechanisms and/or criteria for the identification of appropriate sites to realise this potential, both for Torbay and elsewhere within the

options for the extent of employment land to be provided in the Newton Abbot SRC between 2001 and 2016, ranging from 15-30 hectares. South Hams DC's Core Strategy (Preferred Options) proposes the delivery of 15.6 hectares of employment land outside the Plymouth PUA between 2001 and 2016.

<p>Detailed Sustainability Objectives. Does the proposed approach...</p>	<p>Assessment of effect</p>	<p>Relevant baseline information</p>	<p>Will the effect be temporary or permanent?</p>	<p>Justification for assessment, with reference to:</p> <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations <p>Plus recommendations for mitigating negative effects and improving positive effects</p>
				<p>Sub-Region. Torbay UA's Section 4.4 Submission refers to the targeting of specific sites for both new inward investment and to meet the needs of indigenous employers, including the provision of new infrastructure and a drawing down of external funding to achieve this.</p> <p>According to the draft RSS, in order to maximise the economic prospects and provide a much needed boost to the economy in the Sub-Region, both in terms of job numbers and prosperity, a focus on regenerating underused economic land could reasonably be complemented by the identification of additional employment and housing sites on the urban areas periphery.</p> <p>The text of the Sub-Regional strategy mentions that some poorer quality and less central accommodation might become available for other uses – and this is likely to be one source of potential employment land. However, tourist accommodation should be retained where possible.</p>
<p>3.2 Help everyone afford a comfortable standard of living</p>	<p>✓</p>			<p>The successful delivery of economic regeneration for the Sub-Region should enhance the standard of living for residents</p>
<p>3.3 Reduce poverty and income inequality</p>	<p>✓</p>	<p>Average gross weekly earnings compared to national average earnings of £411 (2003 data): Torbay UA: £340 Teignbridge DC £328 South Hams DC: £352.60</p>		<p>The successful delivery of economic regeneration for the Sub-Region should help reduce poverty and minimise inequalities resulting from a lack of employment opportunities</p>
<p>3.4 Meet local needs locally</p>	<p>?</p>			<p>The 'way ahead' recognises the need for serviced employment land to</p>

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				<p>A particularly important consideration for the successful integration of the new housing proposed will be the delivery of services and facilities to meet the needs of existing and new residents locally. The Sub-Regional report could usefully set out a principle to assess the availability, adequacy and viability of local services and facilities for the existing and new population prior to substantial residential development, with actions identified to ensure good standards of provision.</p>
<p>3.5 <i>Contribute to the regeneration and quality and diversity of the tourism industry</i></p>	<p>✓?</p>	<p>The population in the study area rises from around 200,000 in the winter to 300,000 at the height of the holiday season (Sub-Regional study report)</p>		<p>The 'way ahead' recognises the pressing need for regeneration and upgrading of the resorts in the Sub-Region. However, the Sub-Regional report could usefully go further than setting out the need, to propose Sub-Regionally significant actions to fulfil the need. The text of the Sub-Regional study mentions that "there are opportunities for major investment into key hotels and tourist attractions." These could usefully be detailed.</p> <p>As shown by the baseline data, the tourism element is strongly seasonal. Whilst there will inevitably remain a bias towards summer tourism, opportunities for year-round tourism should be promoted.</p>
<p>3.6 Harness the economic potential of the coast in a sustainable way</p>	<p>✓</p>			<p>Efforts to harness the economic potential of the Torbay PUA set out within the 'way ahead and infrastructure requirements' include the aspiration for the Kingkerswell Bypass/South Devon Link Road, and this should help release the economic potential of the coast.</p>

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3.7 Reduce vulnerability of the economy to climate change and harness opportunities arising	✓?		Long term	The economic diversification of rural areas is mentioned, and this could be extended to include coastal areas, subject to environmental constraints. Regeneration of the economy can assist in instilling a more robust and flexible economy capable of adapting to change, including climate change.
3.8 Ensure a diversification of the economic base of the sub-region to develop a resilience to the changing economy	✓	The structure of the labour market means that the sub-region has a relatively low proportion of workers employed in high-skill occupations. Existing key industries include tourism, fishing (based at Brixham), a much reduced hi-tech sector (based in Torquay, Paiton and Brixham), food manufacture (throughout), engineering (mainly Newton Abbot), local government, health sector, and agriculture (Sub-Regional study report).		Economic regeneration is pursued, which should include diversification and help shift the emphasis from declining to growth sectors. The 'way ahead' refers to the need for economic diversification in rural areas, and this could be extended to include other areas of the Sub-Region. Proactive measures will be required to ensure that this benefit is delivered.
3.9 Help to maintain the agricultural economy	0			
3.10 Reduce the reliance on	✓?			Increased opportunities for year round employment should be delivered

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seasonal work within the sub-region	✓			The 'way ahead and infrastructure requirements' set out some measures and aspirations for the economic regeneration of the Sub-Region. Their delivery would result in enhanced availability of job opportunities, and hence better prospects for working age residents. This benefit for sustainability should be self-reinforcing, with the workforce (size and skills) developing synergistically with the range and availability of job opportunities. The 'way ahead' also refers to delivery mechanisms for affordable housing, which should assist in securing affordable homes for working age residents.
3.11 Retain and encourage in-migration of people of working age				Whilst an assessment of the potential for job generation on employment sites in the Torbay Local Plan is discussed in the Sub-Regional study (thereby helping progress the sustainability objective), the potential for new jobs in Newton Abbot and elsewhere in the Sub-Region is not quantified. It is important to ensure that appropriate new job opportunities are delivered along with new homes, otherwise the intended functions of the centres could fail to be consolidated and/or realised.
3.12 Accommodate the need for growth to reflect the role and function of centres	✓/x?			
High level objective 4: Provide access to meet people's needs with least damage to communities and the environment				
4.1 Reduce the need/desire to travel by car	?		The extent and distribution of new development,	The progression or otherwise of this sustainability objective is dependent on the delivery of economic regeneration. If the aspirations for economic regeneration are delivered, the need for commuting (including by car) will be reduced, and the Sub-Region will become more self-sufficient. If

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				<p>and the aspirations for economic regeneration are not delivered, and the new dwellings are accommodated regardless, then the need to travel by car will increase.</p> <p>The way ahead and infrastructure requirements also seek to deliver the Kingkerswell Bypass/South Devon Link Road to improve links with the motorway network – which clearly has the potential to encourage travel by car. However, this is considered to be a reasonable aspiration in recognition of the pressing need for economic regeneration which, in the longer term, can result in greater Sub-Regional self sufficiency</p>
4.2 Improve strategic rail links	✓✓			<p>The need for better rail services from Newton Abbot to improve integration with the Paddington-Penzance mainline are recognised, and actions are in place to pursue this aspiration.</p>
4.3 Help everyone access basic services easily, safely and affordably	✓			<p>Economic and social regeneration should help enhance the viability of accessible services</p>
4.4 Make public transport, cycling and walking easier and more attractive	✓			<p>Torbay Council is making extensive use of S106 Planning Contributions to improve the bus network.</p> <p>Making cycling and walking more attractive is not directly progressed by the 'way ahead and infrastructure requirements'. It is important to instil high quality living environments within settlements (both existing and new areas) to encourage walking and cycling – and the need to regenerate townscapes could be referred to.</p>
High level objective 5: Maintain and improve environ-mental quality and assets				
5.1 Protect and enhance the	✓			<p>The need to protect and enhance wildlife and landscape is acknowledged.</p>

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				The need to protect and enhance wildlife is recognised		✓		✓		
				It is recognised that careful management of coastal areas is critical		✓				
				AONB, particular in nationally and internationally important areas such as the						
				Plus recommendations for mitigating negative effects and improving positive effects						
				The Torbay Urban Capacity Study indicates that there will be considerable potential to secure development on previously developed land - with urban capacity for approximately 70% of the proposed annual provision within the PUA. This is above Government and RPG targets. (Achieving 70% on PDL will be reliant on the availability of small windfall sites. The take-up of land should be carefully monitored). The proposed Sub-Regional Report could usefully refer to a preference for development on previously developed or underused land.						
				The need to protect and enhance landscape is recognised, including the AONB and rural/urban fringes. However, the need to protect and enhance townscape is not acknowledged. The townscape can be considered a particularly sensitive location, and the need to protect and enhance them could usefully be referred to as a crucial component of the regeneration of the						

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5.7 Maintain and enhance cultural and historical assets	?			The 'way ahead' recognises culture as an aspect of regeneration. However, the need to maintain and enhance historical assets is not acknowledged.
5.8 Reduce vulnerability to flooding, sea level rise (taking account of climate change)	0	Torbay UA occupies a coastal location already vulnerable to flooding. A rise in sea level may increase conflict between urban areas, farmland and protected areas and sites. There is also the potential for flash flooding from run-off. Newton Abbot has more serious fluvial flooding constraints, which could restrict land available for development		Taking into account the varying nature of flood risk across the Sub-Region, Local Development Documents will need to ensure that site specific provisions (including flood management infrastructure) are proactive in reducing vulnerability to flooding.
High level objective 6: Minimise consumption of natural resources				
6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions	0			Energy and emissions are important aspects for sustainability, and the location and design of development so as to reduce energy consumption and greenhouse emissions must be pursued. This issue is not specific to the sub-region, and will be dealt with in other sections of the RSS. However, there are particular opportunities associated with the proposed economic regeneration of the Sub-Region – such as diversification into 'environmental' sectors, and ensuring sustainable construction in the

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6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)	0			extensive new residential development proposed.
6.3 <i>Minimise adverse environmental and social impacts of mineral extraction</i>	0			
6.4 Reduce waste not put to any use	0			
6.5 Minimise land, water, air, light, noise, and genetic pollution	0			
<p>Overall the Way Ahead and Infrastructure Requirements are proactive in the recognition of the necessary elements of a sustainable future for the Sub-Region, in particular the need for the residential growth proposed to be supported by economic and social regeneration. Some specific actions are set out to deliver this regeneration – such as the Kingkerswell Bypass/South Devon Link Road, and better rail integration with the Paddington-Penzance mainline which are considered integral to delivering new job opportunities. The need to provide serviced employment land is also recognised as integral to the realisation of economic regeneration.</p> <p>However, some aspects of the Way Ahead and Infrastructure Requirements recognise a need for action without providing much detail about what that need means in terms of Sub-Regional actions. More specific information regarding priorities for infrastructure and regeneration would provide benefits for sustainability, by increasing the focus of delivery. For example, the Sub-Regional strategy refers to opportunities for major investment into key hotels and tourist attractions, but these are not elaborated. Some lack of detail is also apparent with respect to employment need. The potential job yield from available sites in Torbay PUA has been assessed, but this does not appear to have been undertaken for other spatial components of the Sub-Region including Newton Abbot SRC. Neither is employment need quantified. The proposed Sub-Regional approach could usefully set targets for new job provision for different areas of the Sub-Region, establishing that Torbay will be the main centre of economic</p>				

<p>Detailed Sustainability Objectives. Does the proposed approach...</p>	<p>Assessment of effect</p>	<p>Relevant baseline information</p>	<p>Will the effect be temporary or permanent?</p>	<p>Justification for assessment, with reference to:</p> <ul style="list-style-type: none"> • Likelihood of effect occurring • Geographic scale of effect • Cumulative effects • Current environmental, social and economic trends of affected area • Likelihood of affecting particularly sensitive locations <p>Plus recommendations for mitigating negative effects and improving positive effects</p>
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growth, complemented by growth in Newton Abbot, and provision of appropriate sites for businesses on a smaller scale to meet local needs in smaller settlements. It could also detail the extent of available/required employment land to meet these targets, (although it is appreciated that such information might not be readily available), and desirable growth sectors for different parts of the Sub-Region.

In recognition of the unsustainable outcomes of delivering substantial new residential development in the absence of new employment opportunities, there may be a role for a caveat to say that the high level of residential growth proposed should be subject to the delivery of accompanying employment opportunities. (The draft RSS emphasises the need for economic development to proceed residential development in Newton Abbot). Provision of new jobs and new dwellings would need to be monitored (on an annual basis?) with the potential for a planned slow down in dwelling provision if job provision is not delivered. It is appreciated, however, that response time for a decrease in dwelling supply will be relatively prolonged, as extant permissions are implemented.

A particularly important consideration for the successful integration of the new housing proposed will be the delivery of services and facilities to meet the needs of existing and new residents locally. The Sub-Regional strategy could suggest a principle (to be delivered by local authorities) that prior to granting permission for substantial residential development, an assessment of the availability, adequacy and viability of local services and facilities should be undertaken – considering both the existing and potential new population - with actions identified to ensure good standards of provision.

Additional suggestions for 'Way Ahead' considerations are set out as track changes below. It should be noted that these suggestions do not incorporate the preceding comments.

- Improvement to transport infrastructure. Torbay is the only major resort in the country that is not served by a dual carriageway. There is a pressing need for the Kingskerswell Bypass/South Devon Link Road, to improve links with the motorway network. It has been estimated that the Kingskerswell bypass would lead to the creation of 8,000 jobs within 5 years.
- Better rail services from Newton Abbot are needed to improve integration with the Paddington-Penzance mainline. Torbay council is in discussions with rail operators to increase the number of services. Torbay Council is making extensive use of S106 Planning Contributions to improve the bus network
- Provision of Serviced Employment. Table 11 sets out achievable job yield from land allocated within Torbay. There is likely to be a need for gap funding to provide services for the land and help job start ups.
- Affordable Housing. All the Authorities in the sub-region have very high affordable housing needs. Although part of this will be achieved through Section 106 contributions, there will be a need for Housing Corporation Approved Development Program, and Housing Investment Program funding to assist this;

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<p>particularly increase the supply of rented rather than intermediate housing. Affordable housing should be secured in perpetuity, or where perpetuity is not possible (due to right to buy, right to acquire etc) there should be mechanisms for recycling of the public subsidy.</p> <ul style="list-style-type: none"> ■ Economic, Social and Cultural Regeneration. Meet the pressing need for integrated regeneration of the Sub-Region. This will involve the delivery of balanced communities with opportunities for living, working, leisure and culture, economic diversification – including in rural and coastal areas, and upgrading of the resorts in the Sub-Region. ■ Landscape and Wildlife. Landscape and wildlife protection and enhancement are essential, particularly in nationally and internationally important areas. Careful management of the AONB, coastal areas and rural/urban fringes are critical. ■ Urban Renaissance. Deliver new development in a way that promotes urban renaissance, focusing on regenerating townscapes using previously developed land and underused sites where possible, and integrating 'Green Infrastructure' – open spaces to provide multifunctional benefits for informal recreation, wildlife, flood storage etc - within and around urban areas ■ Accessible Services. Provide suitable sites for community services and facilities including healthcare and learning facilities, appropriately phased to accompany residential growth, and located in such a way as to promote walking and cycling, and access by public transport. ■ Revitalising Retail. Promote viable retail for the Sub-Region within town, district and local centres, accommodating shops appropriate to settlement size and function, to meet the needs of residents and visitors 				

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