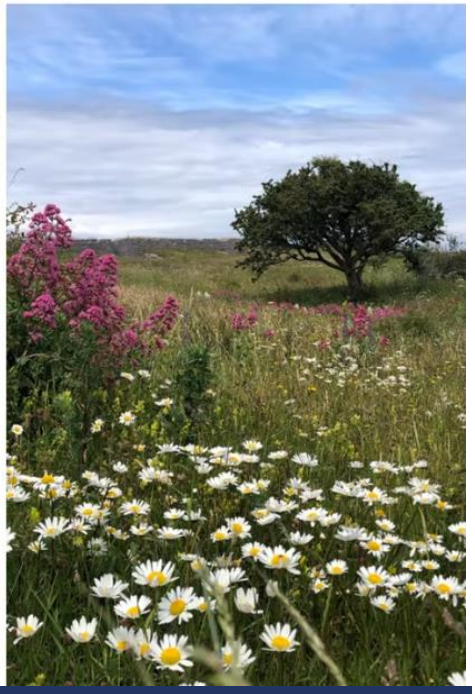
TORBAY COUNCIL







Sustainability Appraisal Addendum

Torbay Local Plan 2025 - 2045: A Landscape to Thrive

Reasonable Alternatives: Scale of Housing Growth

Regulation 22 Plan: December 2026

Table of Contents

Introduction 3
Housing Growth Alternatives 4
Assessing Alternatives 5
Alternative A: Lower growth 6
Alternative B: 8,000 dwellings 6
Alternative C: 2026 HELAA Update (10,919 dwellings) 7
Alternative D: Full Local Housing Need 7
Conclusion and reasons for selecting the strategy 8
Detailed SA Scoring Matrix 9
Objective 1: Reduce and manage the impacts of climate change 9
Objective 2: Improve water, air and soil quality, and minimise noise 9
Objective 3: Minimise waste and increase reuse and recycling 10
Objective 4: Conserve and enhance biodiversity, habitats, species and geodiversity 11
Objective 5: Conserve and enhance the historic environment 12
Objective 6: Protect and enhance landscape, townscape and seascape 12
Objective 7: Reduce car travel and support sustainable and active travel 13
Objective 8: Support strong, diverse and sustainable economic growth 14
Objective 9: Reduce poverty and income inequality 15
Objective 10: Maximise previously developed land and efficient land use 15
Objective 11: Promote safe communities and reduce fear of crime 16
Objective 12: Provide housing meeting the needs of existing and future residents 17
Objective 13: Improve health and wellbeing and reduce health inequalities 17

Introduction

Reasonable alternatives for the scale and distribution of housing growth have been considered throughout preparation of the Torbay Local Plan 2025–2045. The March 2021 **SA Developing and Assessing Reasonable** and the January 2022 **SA Issues and Options Jan2022.docx** established the comparative Sustainability Appraisal (SA) approach used to assess alternative growth strategies.

Earlier SA work tested growth of 700 dwellings per annum. This option performed positively in relation to housing supply and the potential delivery of affordable housing, but it generated the greatest environmental and infrastructure risks. These included increased pressure on biodiversity and European sites, landscape character, greenfield and agricultural land, transport and other infrastructure, water and wastewater systems, flood risk, waste and natural resources. The assessment found that accommodating this scale of growth would be likely to require development in less accessible, more environmentally sensitive or otherwise constrained locations.

The current standard-method figure of 970 dwellings per annum is substantially higher than the 700-dwelling option already appraised. a higher figure would intensify the identified adverse effects and would further increase reliance on constrained greenfield locations and major infrastructure provision.

This addendum has been prepared following the Regulation 19 consultation, in part to respond to comments received about the consideration and appraisal of reasonable alternatives. It also takes account of updated evidence on housing need, land availability and environmental constraints. The housing-growth alternatives have therefore been revisited to ensure that the final SA identifies and evaluates a proportionate range of reasonable alternatives and clearly explains the reasons for selecting the Plan strategy in light of those alternatives and the consultation responses.

Housing Growth Alternatives

Four housing-growth alternatives have been selected to provide a proportionate range around the Regulation 19 strategy and to test the principal choices arising from the evidence. Alternative A tests growth below the Plan provision; Alternative B tests the Regulation 19 strategy of a minimum of 8,000 dwellings; Alternative C tests the full 10,919-dwelling capacity identified in the 2026 HELAA Update; and Alternative D tests the government's Local Housing Need figure of approximately 970 dwellings per year, equivalent to 19,400 dwellings over the Plan period.

These alternatives allow the SA to compare a lower-growth approach, the proposed Plan strategy, the latest assessed land-capacity scenario and full identified housing need. The 2026 HELAA Update is an assessment of site suitability, availability and achievability rather than an allocation document or statement of Council policy. Its 10,919-dwelling subtotal excludes windfall sites to avoid double counting, includes a substantial amount affected by significant constraints, and does not imply that every identified site is developable or deliverable.

Table 1 Housing growth alternative

Alternative	Housing provision 2025–2045	Approx. annual provision	Basis
A: Lower growth	Below 8,000	Below 400 dpa	Growth below the Regulation 19 strategy
B: Regulation 19 strategy	8,000	400 dpa	Proposed Plan provision
C: 2026 HELAA Update	10,919	c.546 dpa	Figure 5: 2026 HELAA Update subtotal
D: Full Local Housing Need	19,400	970 dpa	Standard Method need over the Plan period

Assessing Alternatives

The alternatives have been assessed against the SA objectives using the qualitative methodology established through the earlier reasonable-alternatives assessment:

Major Positive	Major Negative
Minor Positive	Minor Negative
Neutral	Uncertain

The appraisal considers the scale and likely spatial implications of each alternative. Scores have not been totalled to determine a preferred alternative. In particular, a significant negative has not been assigned merely because an alternative accommodates more development. The assessment considers the sensitivity of affected receptors, likely magnitude and cumulative effects, and the potential for avoidance or mitigation. Table 1 below provide a summary of assessment.

Table 2: Assessment Summary

SA objective	A <8,000	B 8,000	C 10,919	D 19,400
Climate change	Minor Negative	Minor Negative	Major Negative	Major Negative
Water, air, soil, noise and natural resources	Minor Negative	Minor Negative	Minor Negative	Minor Negative
Waste and resource use	Minor Negative	Minor Negative	Minor Negative	Minor Negative
Biodiversity, habitats and geodiversity	Minor Positive	Minor Negative	Major Negative	Major Negative
Historic environment	Minor Negative	Minor Negative	Major Negative	Major Negative
Landscape, townscape and seascape	Minor Positive	Minor Negative	Major Negative	Major Negative
Sustainable and active travel	Minor Positive	Minor Positive	Minor Negative	Minor Negative

SA objective	A <8,000	B 8,000	C 10,919	D 19,400
Sustainable economic growth	Minor Positive	Minor Positive	Major Positive	Major Positive
Poverty and income inequality	Minor Negative	Minor Negative	Minor Negative	Minor Negative
Previously developed land / efficient land use	Positive	Positive	Major Negative	Major Negative
Safe communities / fear of crime	Uncertain	Uncertain	Uncertain	Uncertain
Meeting housing needs	Minor Negative	Minor Negative	Minor Positive	Major Positive
Health and wellbeing	Minor Positive	Minor Positive	Minor Positive	Minor Positive

Alternative A: Lower growth

A lower-growth strategy would reduce pressure on greenfield land, biodiversity and landscape and allow a stronger concentration of development within the existing urban area. However, it would provide fewer homes than the Regulation 19 strategy and would therefore make a still smaller contribution towards identified housing needs. On balance, this alternative has **not been selected because its environmental advantages would be accompanied by a greater housing shortfall where the evidence supports planning for a higher level of development**.

Alternative B: 8,000 dwellings

The Regulation 19 strategy provides for a minimum of 8,000 dwellings and maintains a strong emphasis on urban regeneration. The Regulation 19 Publication Version Torbay Local Plan describes the 400 dpa provision as a minimum rather than a ceiling where sustainable urban sites become available.

This alternative does not meet the identified Local Housing Need and therefore has a negative effect against the housing objective. However, compared with higher alternatives it limits reliance upon the wider portfolio of significantly constrained sites.

Alternative B has been selected because it provides a greater contribution towards housing need than the lower-growth alternative while avoiding the degree of reliance on constrained land inherent in Alternatives C–D. The strategy does not prevent additional sustainable housing development where suitable opportunities arise.

Alternative C: 2026 HELAA Update (10,919 dwellings)

Alternative C reflects the 2026 HELAA Update shown in Figure 5 of the Housing Growth Topic Paper. Its subtotal is 10,919 dwellings: 2,260 Green, 1,830 Yellow and 6,829 Amber. Pink windfall examples (195 dwellings) are excluded from the subtotal to avoid double counting.

This assessment identifies substantial potential capacity, but most of the subtotal is in the Amber category. It therefore provides greater housing potential than the Regulation 19 strategy while increasing reliance on sites with significant constraints.

Alternative C has not been selected because the 2026 HELAA Update does not demonstrate that its full 10,919-home subtotal is deliverable; 6,829 dwellings are in the Amber category, and the additional housing potential is accompanied by greater environmental and infrastructure risks.

Alternative D: Full Local Housing Need

Alternative D is the only alternative that would provide for the full identified Local Housing Need and therefore performs most strongly against the housing objective. The Housing Growth Topic Paper records the Standard Method figure at approximately 970 dwellings per year.

However, the resulting 20 year requirement substantially exceeds the theoretical capacity identified through the Council's land-availability evidence. Accommodating this alternative would therefore require sources of development beyond those presently demonstrated through the evidence.

Alternative D has not been selected because the evidence assessed does not demonstrate sufficient suitable and realistically developable land within Torbay to accommodate this level of growth.

Conclusion and reasons for selecting the strategy

The reasonable alternatives assessment demonstrates a clear trade-off. Lower growth reduces pressure on sensitive environmental assets but makes a smaller contribution towards housing need. Higher growth increases housing and potential economic benefits but progressively depends upon a wider range of constrained land and increases environmental and infrastructure pressures.

The assessment also demonstrates that the 2026 HELAA subtotal of 10,919 dwellings should not be equated with a deliverable housing requirement. It is a HELAA capacity assessment, excludes windfall examples to avoid double counting, and includes 6,829 Amber dwellings.

Having regard to the alternatives and the environmental, social and economic effects identified through the SA, the Plan retains provision for a minimum of 8,000 dwellings. This represents a planning judgement informed by the SA and wider evidence rather than an absolute environmental or physical capacity ceiling. The strategy also allows sustainable urban opportunities to contribute additional housing where they become available**.** Regulation 19 Publication Version Torbay Local Plan confirms that the 8,000 home provision is a minimum rather than a ceiling where sustainable urban sites are available.

Detailed SA Scoring Matrix

Objective 1: Reduce and manage the impacts of climate change

Alternative	Score	Explanation and evidence
A: Below 8,000	Minor Negative	Even lower growth would increase embodied and operational energy use and travel demand. However, concentrating fewer homes within the existing urban area would reduce greenfield land-take and avoid some dispersed travel effects. The 2022 SA found that all growth options increased energy consumption, but that lower-growth options were less likely to result in development in less accessible locations or flood-risk areas.
B: 8,000	Minor Negative	The urban-regeneration-led strategy supports development close to services and sustainable transport, but 8,000 additional homes would still increase energy consumption, transport movements, impermeable surfaces and associated emissions. The Regulation 19 SA identifies strong climate policies but notes continuing risks from flooding, coastal change and extreme weather.
C: 10,919	Major Negative	The 2026 HELAA Update scenario has a subtotal of 10,919 dwellings, of which 6,829 are Amber. It would intensify development pressure and associated construction, operational-emissions and accessibility risks.
D: 19,400	Major Negative	This scale substantially exceeds the 2026 HELAA subtotal figure and would require major additional land beyond currently assessed sources. The 2022 SA found that full-needs development would require sites rejected by the HELAA and would generate significant adverse effects from energy use, travel and dispersed growth.

Mitigation: net-zero development standards, embodied-carbon assessment, sustainable locations, renewable energy, active travel, flood-resilient design and monitoring of operational carbon.

Objective 2: Improve water, air and soil quality, and minimise noise

Alternative	Score	Explanation and evidence

A: Below 8,000	Minor Negative	Lower growth would result in the least additional pressure on water supply, wastewater treatment, soils and air quality. Nevertheless, development would still increase resource use, surface-water runoff and pollution risks. The 2022 SA therefore scored even its lower-growth options negatively against this objective.
B: 8,000	Minor Negative	The comparatively modest growth strategy reduces pressure relative to higher alternatives, but would still increase water demand, wastewater flows, runoff and construction impacts. The Regulation 19 SA states that the lower housing target reduces infrastructure pressure, while the HRA identifies a credible water-quality pathway to the Marine SAC from parts of Torquay town centre.
C: 10,919	Major Negative	The 2026 HELAA Update subtotal is 10,919 dwellings, including 6,829 Amber dwellings. Cumulative demands on water infrastructure, drainage and wastewater capacity would be greater, while use of constrained greenfield sites could increase soil loss.
D: 19,400	Major Negative	Full LHN would require development substantially beyond the 2026 HELAA capacity subtotal and would place the greatest pressure on water resources, wastewater infrastructure, soils and air quality.

Mitigation: drainage hierarchy, SuDS, wastewater-capacity phasing, water-efficiency standards, construction environmental management plans, air-quality assessment and protection of best and most versatile agricultural land.

Objective 3: Minimise waste and increase reuse and recycling

Alternative	Score	Explanation and evidence
A: Below 8,000	Minor Negative	Additional households would generate construction, demolition and operational waste, although this alternative would generate the smallest increase. The 2022 SA considered growing household numbers inevitably likely to increase waste arisings.
B: 8,000	Minor Negative	Waste would increase, but the effect would be moderated by the limited scale of growth and Local Plan waste-minimisation policies. The Regulation 19 SA identifies a neutral to minor positive overall resource-use effect where the Plan's safeguards and infrastructure investment are implemented.
C: 10,919	Minor Negative	Waste arisings would rise further. Reuse of existing buildings, including some holiday accommodation, could reduce demolition or greenfield development effects in individual cases, but the evidence

		does not quantify the resulting waste benefit. The appropriate score therefore remains negative.
D: 19,400	Major Negative	Full LHN would substantially exceed the Regulation 19 provision and the 2026 HELAA capacity subtotal, creating the greatest demand for construction materials, recycling and waste-management capacity. The scale and cumulative nature of the increase justify a significant-negative score.

Mitigation: site waste-management plans, circular-economy design, reuse of buildings and materials, construction waste audits and sufficient waste/recycling infrastructure.

Objective 4: Conserve and enhance biodiversity, habitats, species and geodiversity

Alternative	Score	Explanation and evidence
A: Below 8,000	Minor positive & negative	A smaller, urban-focused strategy would reduce greenfield habitat loss and effects on functionally linked land, but urban intensification could still affect urban biodiversity and increase recreation and water-quality pressure. The positive element depends on regeneration delivering habitat creation and biodiversity net gain. The 2022 SA found the lowest options offered opportunities for ecological enhancement.
B: 8,000	Minor Negative	The HRA identifies credible pathways affecting the South Hams SAC and Lyme Bay and Torbay Marine SAC, including bat habitat connectivity, lighting, recreation and water quality. It concludes that adverse effects can be avoided only where the identified mitigation is secured and applied consistently.
C: 10,919	Major Negative	The 2026 HELAA Update identifies 10,919 dwellings in its subtotal, including 6,829 Amber dwellings. This would make avoidance of sensitive areas more difficult and require renewed assessment of cumulative and in-combination effects.
D: 19,400	Major Negative	Full LHN substantially exceeds the 2026 HELAA capacity subtotal and would require additional land, including potentially sites previously rejected as unsuitable. This would create the greatest risk to designated sites, functionally linked bat habitat, ecological connectivity, coastal habitats and recreation-sensitive locations.

Mitigation: avoid sensitive sites and functionally linked land; maintain dark corridors; protect hedgerows and movement routes; provide strategic recreation mitigation; manage visitor pressure;

secure wastewater safeguards; apply project-level HRA where required; monitor European-site condition.

Objective 5: Conserve and enhance the historic environment

Alternative	Score	Explanation and evidence
A: Below 8,000	Minor Negative	Urban concentration could place pressure on conservation areas, listed buildings and their settings. Conversely, regeneration could secure beneficial reuse of vacant or underused heritage assets. The 2022 SA recognised both urban heritage pressure and the potential for regeneration to improve the built environment.
B: 8,000	Minor Negative	Town-centre regeneration and higher densities could affect heritage significance and setting, but the scale allows greater opportunity for site-specific avoidance and design mitigation. The Regulation 19 SA concludes that heritage effects are positive overall where development is carefully managed, while acknowledging residual risks.
C: 10,919	Minor negative or major negative	Maximum theoretical capacity would increase pressure on urban conservation areas, rural settlement settings and archaeological resources. The score is partly uncertain because effects depend on the exact composition and location of the additional housing sources.
D: 19,400	Major Negative	Substantial additional land beyond identified capacity would make avoidance of heritage constraints increasingly difficult. The 2022 SA found that its highest-growth options would significantly affect conservation areas, listed buildings, scheduled monuments and their settings.

Mitigation: heritage impact assessments, archaeological evaluation, appropriate density and building heights, design coding, retention and beneficial reuse of heritage assets and avoidance of harm to rural and coastal settings.

Objective 6: Protect and enhance landscape, townscape and seascape

Alternative	Score	Explanation and evidence

A: Below 8,000	Minor Positive	Lower housing provision would minimise greenfield land-take, settlement expansion and effects on Torbay's National Landscape, undeveloped coast and rural settlement gaps. Urban regeneration could also improve degraded townscape. This mirrors the positive score given to the lower-growth alternatives in the 2022 SA.
B: 8,000	Minor Negative	The strategy limits greenfield expansion but does not eliminate it. The Regulation 19 SA identifies some loss of greenfield and agricultural land, while describing this as less than under higher-growth strategies.
C: 10,919	Major Negative	The 2026 HELAA Update subtotal includes 6,829 Amber dwellings and would increase pressure on landscape-sensitive areas and urban skylines. The assessed capacity is not evidence that every site can be delivered.
D: 19,400	Major Negative	Full LHN would require land far beyond identified capacity, with likely widespread landscape and settlement-pattern change. The 2022 SA found its highest-growth options likely to significantly affect the National Landscape, undeveloped coast and the settings of villages.

Mitigation: landscape and visual impact assessment, avoidance of highly sensitive areas, settlement-gap protection, development-height controls, landscape buffers, green infrastructure and phasing linked to landscape capacity.

Objective 7: Reduce car travel and support sustainable and active travel

Alternative	Score	Explanation and evidence
A: Below 8,000	Minor Positive	If focused on urban regeneration, this alternative would place a high proportion of homes near services, employment and public transport. However, insufficient housing could increase outward migration or commuting, which moderates the benefit. The 2022 SA found urban-focused options best suited to reducing car travel.
B: 8,000	Minor Positive	The Regulation 19 strategy focuses growth on town centres, regeneration areas and sustainable transport corridors. The Regulation 19 SA identifies a minor positive transport effect overall, although local congestion risks remain.
C: 10,919	Minor Negative	The broader theoretical sources would create a more dispersed development pattern and increase pressure on the road network. Potential urban conversions could mitigate some effects, but the

		overall score remains negative because the maximum scenario depends partly on constrained peripheral land.
D: 19,400	Major Negative	Full LHN cannot be accommodated through identified urban capacity alone and would therefore require widespread expansion into less accessible locations. The likely increase in car dependency and network pressure justifies a significant-negative score.

Mitigation: transport-oriented development, frequent public transport, walking and cycling networks, travel plans, mixed-use development, mobility hubs and phased transport improvements.

Objective 8: Support strong, diverse and sustainable economic growth

Alternative	Score	Explanation and evidence
A: Below 8,000	Minor positive & negative	Construction and regeneration would provide some economic activity, but lower housing supply could constrain labour-force renewal, affordability and economic regeneration. The 2022 SA found lower-growth options offered relatively little support for economic resilience and competitiveness.
B: 8,000	Minor Positive	The strategy supports regeneration, town-centre investment, construction and a larger working-age population, while avoiding the most severe environmental costs. The Regulation 19 SA identifies a major positive effect for economic resilience and prosperity from the Plan as a whole.
C: 10,919	Major Positive	This scenario offers greater housing and construction activity and could support a larger workforce. However, its significant-positive score assumes that delivery, infrastructure and environmental mitigation are achievable. The evidence expressly questions whether all component sites could realistically be delivered.
D: 19,400	Major Positive	Full LHN could substantially expand housing supply, construction activity and the workforce. The score is not unqualified because no evidence demonstrates that this scale is deliverable, and severe environmental and infrastructure constraints could undermine sustainable economic benefits.

Mitigation/enhancement: align homes with employment land and infrastructure, prioritise family and affordable housing, secure local employment and skills measures and phase development to avoid infrastructure deficits.

Objective 9: Reduce poverty and income inequality

Alternative	Score	Explanation and evidence
A: Below 8,000	Major Negative	Severe housing undersupply would worsen affordability and reduce opportunities for affordable housing delivery. The 2022 SA linked lower growth to housing inequality, suppressed household formation, overcrowding and outward migration of younger people.
B: 8,000	Minor Negative	The strategy would deliver more homes and affordable housing than Alternative A, but would remain substantially below LHN. Consequently, affordability and inequality pressures would remain. The Regulation 19 SA identifies an unresolved weakness around housing provision and affordability.
C: 10,919	Minor Positive	This scenario would provide the greatest housing and affordable-housing opportunity within the identified theoretical capacity envelope. The benefit remains dependent on site viability and deliverability, which the Topic Paper identifies as problematic for some sources.
D: 19,400	Minor Positive	Meeting full LHN would provide the strongest numerical response to housing shortage and affordability. It is scored positive rather than significantly positive because housing quantity alone does not prove that homes would be affordable, appropriately located or deliverable. The available evidence does not quantify affordable-housing delivery under this scenario.

Mitigation/enhancement: affordable-housing requirements, tenure mix, family and specialist housing, use of public land, housing delivery monitoring and viability review mechanisms.

Objective 10: Maximise previously developed land and efficient land use

Alternative	Score	Explanation and evidence

A: Below 8,000	Major Positive	This alternative could be accommodated most readily through existing allocations, brownfield land, conversions and urban intensification, minimising greenfield release. It therefore aligns strongly with the objective, subject to avoiding town cramming. The 2022 SA scored its urban-focused options positively.
B: 8,000	Major Positive	The Regulation 19 strategy expressly prioritises urban regeneration and supports additional sustainable urban development above 8,000. Although some greenfield land is included, the dominant spatial approach remains brownfield and regeneration-led.
C: 10,919	Major Negative	The 2026 HELAA Update subtotal combines 2,260 Green, 1,830 Yellow and 6,829 Amber dwellings. Although Pink windfall examples are excluded to avoid double counting, the assessed total still relies heavily on constrained land.
D: 19,400	Major Negative	Full LHN exceeds identified urban capacity and the 2026 HELAA Figure 5 capacity subtotal. It would require extensive additional greenfield development and therefore conflicts strongly with maximising previously developed land.

Mitigation: brownfield-first phasing, minimum-density requirements, vacant-building reuse, upper-floor development, land assembly and regeneration funding, with greenfield release contingent on urban delivery evidence.

Objective 11: Promote safe communities and reduce fear of crime

Alternative	Score	Explanation and evidence
A: Below 8,000	Uncertain	The effect would depend on the layout, design, management and location of individual schemes rather than housing quantity alone.
B: 8,000	Uncertain	Regeneration could increase activity and natural surveillance, but the evidence does not establish a direct strategic relationship between this housing number and crime outcomes.
C: 10,919	Uncertain	The mixture of urban conversion, intensification and greenfield development prevents a reliable strategic score without scheme-level information.
D: 19,400	Uncertain	The scale alone does not establish whether communities would be safer or less safe. Design, connectivity, management and infrastructure provision would determine the effect.

Mitigation: Secured by Design principles, active frontages, good lighting designed alongside ecological dark-corridor requirements, inclusive public realm and safe walking and cycling routes.

Objective 12: Provide housing meeting the needs of existing and future residents

Alternative	Score	Explanation and evidence
A: Below 8,000	Major Negative	This would increase the already substantial shortfall against LHN and reduce the potential supply of affordable, family and specialist housing. The 2022 SA identified affordability, overcrowding and outward migration risks from low growth.
B: 8,000	Major Negative	The option delivers 400 dpa against an LHN of approximately 970 dpa. While it provides a substantial planned supply, it meets only about 41% of the annual LHN figure and therefore has a significant residual adverse effect against this objective. The Regulation 19 SA identifies this shortfall as a significant unresolved weakness.
C: 10,919	Minor Negative	At about 546 dpa, this is the highest HELAA capacity scenario tested and would provide just over half the annual LHN figure. It improves the housing outcome but does not meet assessed need, and 6,829 dwellings are in the Amber category.
D: 19,400	Major Positive	This is the only scenario matching approximately 970 dpa across 20 years and therefore performs most strongly against the numerical housing objective. However, the score relates to meeting need, not to land availability or overall sustainability.

Mitigation/enhancement: optimise sustainable urban capacity, ensure housing mix and tenure requirements, maximise affordable housing, maintain a deliverable trajectory and provide an early-review mechanism if delivery or capacity assumptions change.

Objective 13: Improve health and wellbeing and reduce health inequalities

Alternative	Score	Explanation and evidence

A: Below 8,000	Minor positive & negative	Lower environmental pressure and better access to existing services and active travel could support health. However, inadequate and unaffordable housing can worsen health inequalities, overcrowding and social exclusion.
B: 8,000	Minor Positive	This option supports regeneration, improved neighbourhoods, active travel and additional housing while limiting the greatest environmental effects. The Regulation 19 SA identifies positive health and wellbeing effects, moderated by the housing shortfall.
C: 10,919	Minor positive & negative	Housing availability and potentially greater infrastructure contributions are beneficial. However, dispersed development, increased car dependency, environmental loss and pressure on services could offset those gains.
D: 19,400	Minor positive & negative	Meeting housing need could significantly improve access to housing, but there is no evidence that Torbay has sufficient land or infrastructure to accommodate this level sustainably. Environmental harm, congestion and infrastructure pressure could adversely affect wellbeing, leaving a mixed overall score.

Mitigation/enhancement: healthy-place design, accessible green space, active travel, health facilities, affordable and adaptable homes, air-quality controls and infrastructure delivery synchronised with occupation.