



Torbay Local Plan Review Sustainability Appraisal / Strategic Environmental Assessment

Scoping Report (January 2021)

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1. Introduction

Sustainability Appraisal (SA) is an integral part of preparing the Local Plan review. The aim of the SA process is to assess the overall environmental, social and economic impact of the plan to ensure that it contributes towards achieving sustainable development. Sustainability Appraisal offers a systematic way for checking and improving on plans as they are being developed.

Strategic Environmental Assessment (SEA) is a process of identifying and evaluating the environmental impacts of a plan or programme. In 2001, the European Union adopted Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. The Directive came into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Local Plans¹. Sustainability Appraisal extends the concept of Strategic Environmental Assessment to include economic and social concerns. Under the Planning and Compulsory Purchase Act 2004, Local Authorities must undertake SA for each of their Development Plan Documents (DPDs). SA is therefore a statutory requirement for Local Plans along with SEA.

The Scoping Report is the first stage of the sustainability appraisal process. It involves setting the context, identifying the baseline and producing sustainability objectives, namely setting the scope for the appraisal process. This SA Scoping Report draws and builds upon previous scoping reports, the latest legislative and policy developments and updated evidence. It therefore sets out background information that will be used to test the sustainability of the Local Plan Review in the sustainability appraisal process.

The National Planning Policy Framework (NPPF) states that a Local Plan should be reviewed every 5 years in order to be considered up-to-date. The Local Plan review will need to consider refreshing Local Plan policies in relation to national policy changes, updated evidence in relation to a range of local planning issues and the

1 http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf

need to plan for more new housing in the context of the consideration of sustainable development and climate change emergency. The revised NPPF was published in February 2019. This introduced a number of key changes to plan making. The minimum number of homes needed in an area should be assessed using a standard methodology, which takes the latest household projections and adds a buffer for housing unaffordability. At May 2020 the Local Housing Need Figure for Torbay was about 586 dwellings per year. The NPPF requires local plans to meet the minimum local housing need figure as a test of soundness (Paragraph 35) and as part of the presumption in favour of sustainable development for plan making (Paragraph 11a-b); unless: the application of policies within the NPPF that protect assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Hence, the importance of the SA process to test this aspect of Torbay's overall capacity for growth.

Although the scoping stage is a key stage in the process, a formal scoping report is not required by law but is a useful way of presenting information at the scoping stage. A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the plan being assessed.

The Scoping Report contains the following:

- An outline of the methodology and description of the SA/SEA process and the specific SA/SEA tasks undertaken.
- A review of other plans and programmes and their relationship to the Torbay Local Plan Review.
- A description of the environmental and sustainability context, or baseline information.
- A summary of key sustainability issues.
- The SA/SEA Framework which sets out the SA/SEA objectives for assessing the Torbay's Local Plan Review.

2. Methodology

A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan Review. This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the land use plan.

Guidance on the preparation of SA can be found on the National Planning Policy Guidance (NPPG) website². Best practice is to incorporate the requirements of the SEA Directive into a wider Sustainability Appraisal process. The SEA Directive provides a means of ensuring due consideration of environmental issues during the preparation and adoption of plans.

In order for SA to be effective, it should be fully integrated into the plan-making process. It should be started as soon as a new or revised development plan document is first considered, and should provide input at each stage when decisions are taken. There are five stages of the SA, shown in the diagram below (figure 1). The diagram also sets out the local plan process that occurs simultaneously. This report addresses the first stage of the process – Stage A in the diagram below.

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Sustainability-appraisal-process>

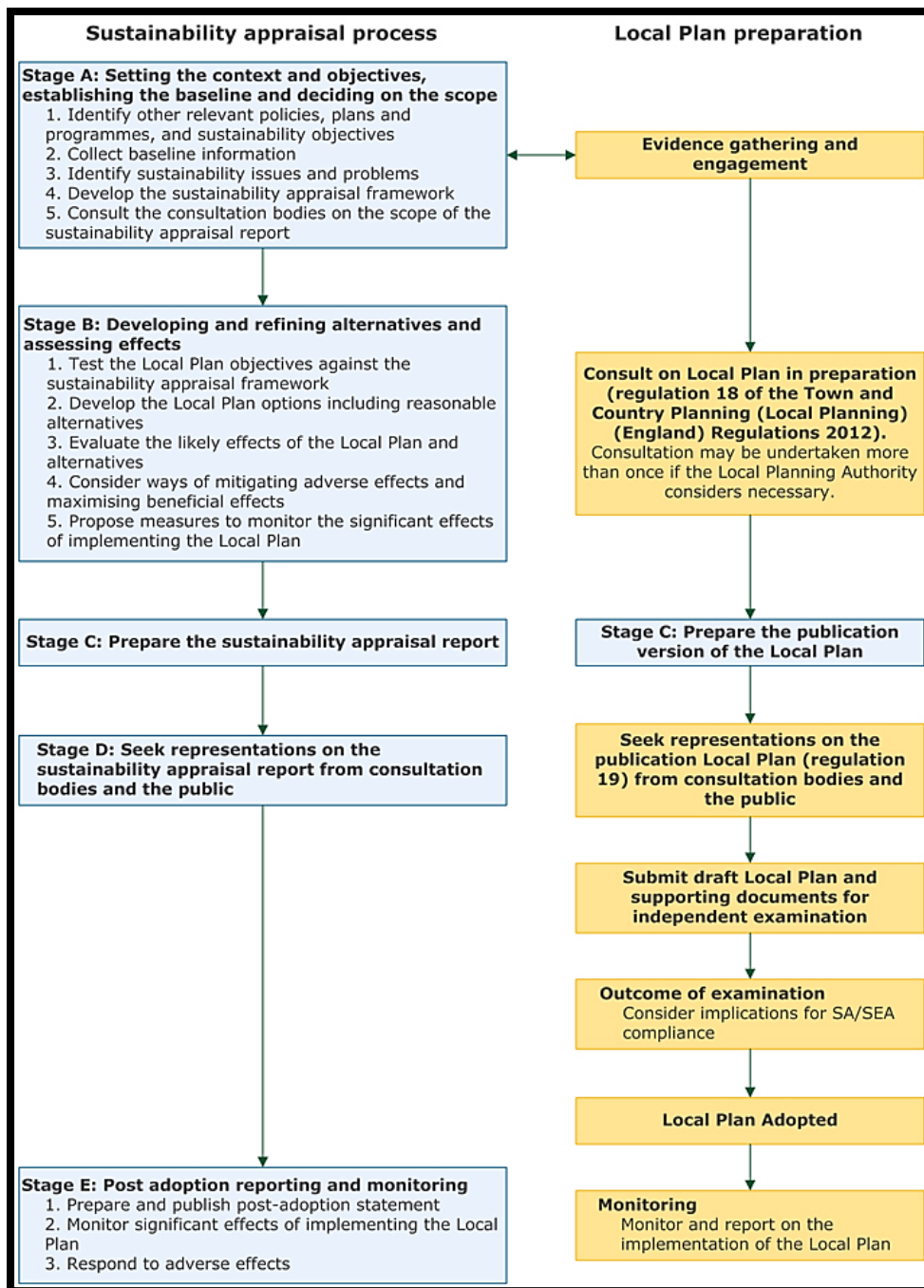


Figure 1: Sustainability Appraisal Key stages³

³ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/> Paragraph: 013 Reference ID: 11-013-20140306 Revision date: 06 03 2014

3. Policy Context

3.1 Review of other relevant plans, policies and programmes (PPP)

Task A1 of the SA process requires the identification and review of relevant PPPs that will affect or influence the plan. A number of plans and policies that were identified as being of relevance during the Sustainability Appraisal scoping stage in 2009 have consequently been further reviewed and updated, and there will also be new PPPs to reflect the changes in planning policies and socio-economic or environmental events since that time. The Plans, Policies and Strategies are unlikely to be exhaustive as they are reviewed, updated and replaced regularly. The review will help to identify key sustainability issues and problems in Torbay, inform the baseline data and will be incorporated into the sustainability framework.

The list in table 1 below sets out a summary list of plans, policies and programmes that have been reviewed as part of the SA scoping process. A brief description of the overall purpose of each of the plans, policies and programmes, their objectives and targets, as well as the implications arising from them, is set out in Appendix A.

Table 1: List of Plans, Policies and Programmes

SA Topic	Relevant plans, policies and programmes
General	<ul style="list-style-type: none">▪ The National Planning Policy Framework (NPPF) (2019)▪ Planning for the Future (2020)▪ National Design Guide (2019)▪ Localism Act (2011)▪ Town and Country Planning Legislation (2017)▪ One Torbay: Working for all Torbay, Community and Corporate Plan 2019 – 2023 (Draft)▪ Our plan to rebuild: The UK Government's COVID-19 recovery strategy (2020)
Access and equality	<ul style="list-style-type: none">▪ Equality Act (2010)
Air quality	<ul style="list-style-type: none">▪ Clean Air Strategy (2019)
Natural resources	<ul style="list-style-type: none">▪ European Water Framework Directive (2000/60/EC)▪ Contaminated Land Strategy (2011)

SA Topic	Relevant plans, policies and programmes
	<ul style="list-style-type: none"> ▪ National Planning Policy for Waste (2014) ▪ Devon Waste Local Plan, Devon County Council (2014) ▪ South Devon and Dorset Shoreline Management Plan SMP 2 (2011)
Climate change	<ul style="list-style-type: none"> ▪ Climate Change Act (2008) ▪ Torbay Energy and Climate Change Strategy (2014-2019) ▪ The Clean Growth Strategy (2017)
Biodiversity	<ul style="list-style-type: none"> ▪ A Green Future: Our 25 Year Plan to Improve the Environment (2018) ▪ Natural Environment and Rural Communities (NERC) Act (2006) ▪ South Marine Plan (2018) ▪ Conservation of Habitats and Species Regulations (2017) as amended ▪ Biodiversity Net Gain - Principles and Guidance for UK Construction and Developments (2016)
Cultural Heritage Landscape	<ul style="list-style-type: none"> ▪ Devon Landscape Character Assessment ▪ Torbay Heritage Strategy (202- 2026) ▪ South Devon Area of Outstanding Natural Beauty Management Plan (2019 - 2024)
Health and wellbeing	<ul style="list-style-type: none"> ▪ Health and Social Care Act (2012) ▪ Torbay Sports Facilities Strategy (2014) ▪ Joint Health and Wellbeing Strategy 2018-2022)
Economic aspects	<ul style="list-style-type: none"> ▪ The UK's Industrial Strategy (2017) ▪ Housing & Planning Act (2016) ▪ Torbay Economic Strategy (2017 – 2022) ▪ Heart of the South West Local Industrial strategy (2019) ▪ English Riviera Destination Management Plan (2017 – 2022) ▪ Local Transport Plan - Devon and Torbay Strategy (2011 – 2026) ▪ Tor Bay Port Masterplan and Addendum (2019-2024)
Social aspects	<ul style="list-style-type: none"> ▪ Communication, Consultation and Engagement Strategy (2016 – 2020) ▪ ENJOY, TALK, DO, BE... A cultural strategy for Torbay and its communities (2014 -2024)

4. Sustainability Context

4.1 Baseline information

The term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. This information will enable the potential effects of the implementation of the plan to be assessed in the context of existing and potential environmental, economic and social trends.

A robust understanding of the baseline position is important in ensuring a sound evidence base for the plan. Baseline information can also help to identify sustainability problems which the plan should seek to address and also provides the basis for predicting the effects of different options for the plan. It can also be used as a benchmark to monitor the likely significant effects of implementing the plan.

This baseline information covers social, environmental and economic characteristics of Torbay. It includes the SEA topics such as air quality, biodiversity, climatic factors, cultural heritage and landscape, energy, material assets, population and human health, transport, waste, water and soil, and also includes economy, infrastructure and social inclusion.

More details in Appendix B.

4.2 Existing Sustainability Issues and Problems

The purpose of this section is to identify sustainability issues and problems to address in Torbay. Through the review of other plans, policies, programmes and the baseline information, specific key issues have been identified then grouped under three sustainability aspects (social, environment and economic). These will be used to inform the SA objectives. Table 2 below broadly identifies the issues and problems in Torbay.

Table 2 : Sustainability Issues and Problems

Sustainability issues	Issues to be addressed
Social issues	
Ageing population	<p>Addressing the needs of an ageing population with increasing demands on health and social care.</p> <p>An increasing requirement for home adaptations or more specialised accommodation.</p> <p>There is a proportional fall in the number of working age people (albeit the 2018 based figures show an absolute increase in working age people).</p>
High rate of obesity (and excess weight) from an early age through to adulthood	<p>Helping to promote healthy lifestyles through:</p> <ul style="list-style-type: none"> ▪ Access to recreation, leisure and open space as well as access to formal health facilities. ▪ Enabling active travel ▪ Supporting an environment which promotes a healthy diet
High level of deprivation	<p>Tackling deprivation and social exclusion in areas where access to services, good quality housing which meets local needs and education is poor. Especially improving indoor and outdoor living environment conditions within the most deprived areas.</p> <p>Actively reduce poor quality accommodation and concentrations of Houses of Multiple Occupation (HMOs) in deprived areas.</p>
Shortage of affordable and suitable homes for local people at different stages of life	<p>Ensuring a sufficient supply and mix of homes including affordable homes to meet current and future needs.</p> <p>Housing conditions are an area of concern with a higher percentage of private rented housing and significantly lower numbers of residents in social rented housing.</p>
The concentration of crime in the central areas of Torquay and Paignton.	<p>The Local Plan Review can have a key role in promoting well managed environments and secure buildings which will influence the levels of crime, anti-social behaviour and fear of both.</p>
The need for resilience	<p>The need to create resilience and a level of self-sufficiency into communities and the local economy to enable them to</p>

	withstand and recover from external crises such as the COVID-19 pandemic and the effects of climate change.
Economic issues	
Shortage of good quality unconstrained employment land	The economic potential can be restricted by lack of provision of the right mix of employment land needed to meet the needs of businesses. It can also be constrained as an unintended consequence of a drive for more housing.
Low average incomes	Maintaining a healthy, vibrant and diverse economy into the future.
Local skills shortages	Ensuring the adequate provision of skills/training facilities and attracting younger people to live and work in the area.
Environmental issues	
Potential for environmental damage to sensitive habitats and species	Ensuring biodiversity and the habitats both terrestrial and marine that support it are protected and enhanced. Ensuring the provision of an interconnected network of multi-functional public open spaces and green infrastructure that sits within a strategic framework and improve people's access to nature. Ensuring biodiversity net gain is included in the development process.
The potential for climate change cumulative effects on ecosystem services (global, national and local)	Climate change is a key issue for the Local Plan Review to address. It is impacting not only the environment, but also the economic and social aspects of life. Addressing climate change targets includes vulnerability to flooding, managing the risk of coastal erosion and retreat, addressing thermal comfort and rising consumption of finite resources, especially carbon emitting energy.
Air quality and noise	Reducing traffic, and therefore air and noise pollution, and easing congestion along main road networks. The Local Plan Review can identify appropriate locations for homes, workplaces, education, retail and leisure facilities and potentially polluting industrial development.
Impact on nationally important landscapes	Encroachment of nationally important landscape and it's setting around the South Devon Area of Outstanding Natural Beauty.

There are limited areas of undeveloped Best and Most Versatile agricultural land (BMV) within Torbay	The conservation of healthy soils is key to the provision of food to support healthy lifestyles, in addition to the role they play in carbon storage, supporting biodiversity, water regulation and fuel provision.
Declining historic heritage	Preserving and enhancing the distinctive historic and built heritage. Conserving, enhancing and enjoying the historic environment and ensuring that this is not adversely affected by new development.
Increased waste generation	Ensuring provision for waste is adequate for the current and future development needs, bearing in mind the land available to dispose of this waste (landfill sites) is reducing.

4.3 Sustainability Appraisal Framework

Developing a SA framework provides a way in which sustainability effects can be described, analysed and compared, which forms a central part of the SA process. A set of sustainability objectives and their indicators make up the SA framework. These objectives and indicators can also then be used to monitor the implementation of the Torbay Local Plan Review.

Table 3 below shows the proposed framework for the SA of the Local Plan Review. The number of objectives has been limited to ensure that they do not make the SA process unmanageable. It should be noted that the Local Plan Review may have limited scope to significantly influence some of the objectives. A reliance on other partners' plans and strategies will be required to ensure the delivery of measurable outcomes. Reference to the SEA topics show how the SA objectives have complied with the SEA Directive.

Table 3: Sustainability Framework

Sustainability objective	Indicators	SEA topic
1. To reduce and manage the	<ul style="list-style-type: none"> ▪ Local estimates of per capita CO2 emissions 	Climatic factors

Sustainability objective	Indicators	SEA topic
impacts of climate change	<ul style="list-style-type: none"> ▪ Carbon footprint of energy use in domestic, commercial and industrial properties ▪ Average annual domestic consumption of electricity and gas ▪ Amount of energy generated from renewable sources ▪ Number of developments incorporating green walls and/or green roofs ▪ Number of residential and non-residential properties granted planning permission in areas at risk of flooding 	
2. To improve water, air, soil quality and minimise noise levels	<ul style="list-style-type: none"> ▪ Drinking water quality ▪ Number of beaches in Torbay managed to Blue Flag and Seaside Awards ▪ Number of AQMA ▪ Area of land in Torbay potentially requiring remediation ▪ Loss of “Best and Most Versatile Agricultural Land” to development ▪ Number of noise complaints 	Air, water, soil and human health
3. To minimise waste and increase the recycling and reuse of waste materials	<ul style="list-style-type: none"> ▪ Percentage of Torbay’s household waste reused, recycled and composted ▪ Residual household waste arising ▪ Percentage of new non-residential development achieving minimum standards as required by the Council 	Material assets
4. To conserve, protect and enhance habitats and species, and geodiversity	<ul style="list-style-type: none"> ▪ Ecological Footprint ▪ Condition and number of nationally or locally designated sites ▪ Amount of green infrastructure delivered ▪ Number and condition of global, national and local geological designated sites ▪ Percentage of major developments generating overall biodiversity enhancement ▪ Number of planning approvals that generated any adverse impacts on sites 	Biodiversity, flora and fauna

Sustainability objective	Indicators	SEA topic
	<p>of acknowledged biodiversity importance.</p> <ul style="list-style-type: none"> ▪ Hectares of biodiversity habitat delivered through strategic site allocations 	
5. To conserve, enhance and enjoy the historic environment.	<ul style="list-style-type: none"> ▪ Number of listed buildings at risk ▪ Number of Scheduled Monuments at risk ▪ Number of conservation areas at risk ▪ Number of Historic Parks and Gardens at risk 	Cultural heritage
6. To protect, enhance and manage the character and quality of the landscape, townscape and seascape	<ul style="list-style-type: none"> ▪ Area covered by the AONB ▪ Area covered by the Countryside Zone ▪ Number of parks and green space managed to green flag standard ▪ Amount of new development in AONB/Heritage Coast that generated adverse impact on sites ▪ Percentage of the Plan area's population having access to a natural greenspace within 400 metres of their home. ▪ Length of greenways constructed. ▪ Hectares of accessible open space per 1000 population 	Landscape
7. To reduce the need and desire to travel by car and support sustainable/active modes of travel	<ul style="list-style-type: none"> ▪ Ease of access to key services ▪ Satisfaction with local bus services ▪ Number of annual bus passenger journeys ▪ Number of bus passes issued ▪ Walking and cycling rates 	Air, climatic factors and human health
8. To support strong, diverse and sustainable economic growth	<ul style="list-style-type: none"> ▪ Per head Gross Value Added (GVA) ▪ Net change in number of VAT registration ▪ Jobs Density in Torbay ▪ Amount of land developed for employment in Torbay ▪ Mean annual gross pay for all employees in Torbay 	Population and human health

Sustainability objective	Indicators	SEA topic
	<ul style="list-style-type: none"> Percentage of Torbay's workforce with no qualifications 	
9. To reduce poverty and income inequality	<ul style="list-style-type: none"> Index of Multiple Deprivation ranking Resident population in top 20% most deprived areas in England Percentage of households in fuel poverty Percentage of working age population claiming jobseekers allowance 	Population and human health
10. To maximise the use of previously developed land/ buildings and encourage the efficient use of land	<ul style="list-style-type: none"> Average density of new development in Torbay Proportion of new dwellings built on brownfield land 	Material assets and soil
11. To promote safe communities and reduce fear of crime	<ul style="list-style-type: none"> Crime rate in Torbay Number of new developments incorporating Secured by Design features Number of looked after children 	Population
12. To provide housing that meets the needs of existing and future residents	<ul style="list-style-type: none"> Number of households on the housing register Gross affordable housing completed House price income ratio in Torbay Statutory homelessness 	Population, human health and material assets
13. To improve health and wellbeing and reduce health inequalities	<ul style="list-style-type: none"> Life expectancy at birth Percentage of population over 65 years of age Percentage of children and adults classified as overweight or obese The change in count of LSOAs in Torbay in the top 20% most deprived in England Rate of premature mortality and all-cause mortality 	Human health

Sustainability objective	Indicators	SEA topic
	<ul style="list-style-type: none"> ▪ Percentage of overcrowded households ▪ Percentage reporting bad health status and long term health problems/disability 	

4.3.1 Compatibility of sustainability objectives

This section tests the sustainability objectives identified in this report against each other. The compatibility test is carried out in order to identify any conflicts that may exist between the objectives. Upon identifying any conflicts the objectives can be modified, making them more compatible, or at least to ensure subsequent decisions are well informed and mitigation or alternatives are considered.

The matrix in figure 2 shows the majority of the objectives are compatible which means they strengthen and support each other. However, some potential incompatibilities have been identified. Conflicts are always likely to arise between the provision of new development and the protection and enhancement of the environment. Any impacts on the global climate and biodiversity as a result of new development would need to be resolved in accordance with criteria set out in national, regional and local guidance.

Sustainability objective 5 may be compatible with sustainable objective 8 as economic growth may enable heritage assets that are at risk or vacant or underutilised to find compatible and viable new uses. However, as with most of the sustainability objectives in relation to the historic environment/cultural heritage, there is the potential for negative as well as positive effects.

1. Climate change																		
2. Water/air/soil	√																	
3. Waste	√	√																
4. Ecology	√	√	√															
5. Heritage assets	√	√	0	√														
6. Landscape	0	√	√	√	√													
7. Sustainable travel	√	√	√	√	√	√												
8. Economic growth	X	√	√	√	√	√	√	X										
9. Poverty and inequality	0	0	0	0	√	0	√	√										
10. Efficient use of land	√	√	√	√	0	√	√	√	√									
11. Crime	0	0	0	0	0	√	0	0	√	√								
12. Housing	X	X	X	X	√	U	X	√	√	√	√							
13. Health	√	√	√	√	√	√	√	√	√	√	√	√						
	1. Climate change	2. Water/air/soil	3. Waste	4. Ecology	5. Heritage assets	6. Landscape	7. Sustainable travel	8. Economic growth	9. Poverty and inequality	10. Efficient use of land	11. Crime	12. Housing	13. Health					

Figure 2: Compatibility test

Key:

√ Compatible

X Potential conflict

U Uncertain

0 No link

5. Consultation

The Draft Scoping Report was subject to consultation with the SEA statutory bodies; Historic England, the Environment Agency and Natural England. Public consultation is not required at this stage of the Sustainability Appraisal process. Any consultation responses received will be considered and will inform the development of the final SA Scoping Report.

Table 4 below provides a list of the consultation question that were also provided at the end of each section.

Table 4: Consultation questions

	Section	Consultation question
3	Other Policies, Plans and Programmes and Appendix A	Q1: Are there other relevant policies, plans, programmes, strategies or guidance that will affect or influence the Torbay Local Plan Review?
4.1	Baseline Report and Appendix B	Q2: Do you have, or know of, any additional baseline data which should be added to that already listed? Q 3: As far as you are aware, are there any inaccuracies or anomalies in the data presented?
4.2	Sustainability Issues and Problems	Q4: Are you aware of any issues which should be added or removed?
4.3	Sustainability Appraisal Framework	Q5: Are there any other additional objectives that should either be included or are there any that should be removed? Q6: Are there any other indicators that should be added or are there any that should be removed?

6. Appendices

Appendix A: Review of Relevant Plans, Policies and Programmes

PPP	Aim, objectives/targets	Implication for LPR and SA
General		
The National Planning Policy Framework (NPPF) (2019)	<p>The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied. It sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities. It contains a presumption in favour of sustainable development at plan-making and a test of soundness for examining plans. Both prioritise meeting the area’s development needs.</p>	<p>The NPPF presents the Government’s approach to development in respect of social, economic and environmental issues.</p>
Planning For the Future (2020)	<p>This reiterates the government’s intention of boosting housing numbers, with a target of 300,000 units a year nationally. Further measures will be brought forward to achieve this including a requirement for all areas to have an up to date local plan by 2023, a revised standard methodology for calculating housing need, and emphasis on increasing densities in sustainable locations.</p>	<p>The Local Plan Review needs to take into account the Planning For the Future</p>

National Design Guide (2019)	The National Design Guide illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.	The Local Plan Review needs to take into account the National Design Guide
The Localism Act (2011)	<p>The Localism Act introduces a number of measures to decentralise decision making process to the local level, creating space for Local Authorities to lead and innovate, and giving people the opportunity to take control of decisions that matter to them. The Localism Act includes a number of important packages.</p> <ul style="list-style-type: none"> ▪ The new act makes it easier for local people to take over the amenities they love and keep them part of local life; ▪ The act makes sure that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done. ▪ The act places significantly more influence in the hands of local people over issues that make a big difference to their lives. ▪ The act provides appropriate support and recognition to communities who welcome new development. 	The Local Plan Review needs to take into account the Localism Act
Town and Country Planning Act 1990	States the policies and general proposals for the development and other use of land in its area; takes account of the policies at national and regional level insofar as they affect the physical and environmental planning of its area; and provides the framework for local plans.	The Local Plan Review needs to take into account the Town and Country Planning Act
Town and Country Planning Legislation (2017)	A range of legislation published in 2017 is of relevance to the Local Plan. This includes:	The Local Plan Review policies should take into account the Town and Country Planning Legislation

	<ul style="list-style-type: none"> ▪ The Neighbourhood Planning Act 2017 – Act aims to strengthen neighbourhood planning by ensuring that planning decision- makers take account of well-advanced neighbourhood development plans and by giving these plans full legal effect at an earlier stage. ▪ The Town and Country Planning (Brownfield Land Register) Regulations 2017 - The regulations require local authorities to prepare and maintain registers of brownfield land that is suitable for residential development. ▪ The Town and Country Planning (Permission in Principle) Order 2017 - Order provides that sites entered on Part 2 of the new brownfield registers will be granted permission in principle. <p>The regulations aim to improve the quality and consistency of data held by local planning authorities, which will provide certainty for developers and communities, encouraging investment in local areas.</p>	
<p>One Torbay: Working for all Torbay Community and Corporate Plan (2019 – 2023) (draft)</p>	<p>The Corporate Plan four Priorities are:</p> <p>Thriving people: Turn the tide on poverty and have high aspirations for all of our residents.</p> <p>Thriving economy: Create an environment in which businesses and jobs can grow and be the premier tourist resort in the UK.</p> <p>Tackling climate change: Become a Carbon Neutral Council.</p> <p>Council fit for the future: The Council will provide efficient and effective services and be open and transparent with our communities.</p>	<p>The Local Plan Review should reflect the priorities of the Community and Corporate Plan.</p>
<p>Our plan to rebuild: The UK Government's COVID-19 recovery strategy (2020)</p>	<p>The Government's aim has been to save lives. This continues to be the overriding priority at the heart of this plan.</p> <p>The Government also seek to minimise the other harms it knows the current restrictive measures are causing - to people's wellbeing, livelihoods, and wider health. But there is a risk that if the Government</p>	<p>The Local Plan Review should take into account the social and economic impacts of Covid-19.</p>

	<p>rushes to reverse these measures, it would trigger a second outbreak that could overwhelm the NHS. So the UK must adapt to a new reality - one where society can return to normal as far as possible; where children can go to school, families can see one another and livelihoods can be protected, while also continuing to protect against the spread of the disease.</p> <p>Therefore the Government's aim at the centre of this plan is to: Avoid a new epidemic, minimise lives lost and maximise health, economic and social outcomes.</p>	
Access and equality		
Equality Act (2010)	<p>The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society.</p> <p>Discrimination can come in one of the following forms:</p> <ul style="list-style-type: none"> ▪ Direct discrimination - treating someone with a protected characteristic less favourably than others. ▪ Indirect discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage. ▪ Harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them. ▪ Victimisation - treating someone unfairly because they've complained about discrimination or harassment. 	<p>The Local Plan Review should ensure the principles of equality and inclusion are considered when planning for communities in Torbay.</p>
Air quality		
Clean Air Strategy (2019)	<p>The Clean Air Strategy sets out the case for action and demonstrates the Government's determination to improve our air quality. In some cases the</p>	<p>The Local Plan Review policies and SA should support the delivery of</p>

	<p>goals that the strategy has set are even more ambitious than EU requirements.</p> <p>This Strategy sets out the comprehensive action that is required from across all parts of government and society to meet these goals. New legislation will create a stronger and more coherent framework for action to tackle air pollution. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms.</p>	<p>affordable energy, clean growth and healthier lifestyles as they develop and implement proposals for tackling air quality.</p>
Natural resources		
<p>European Water Framework Directive (2000/60/EC)</p>	<p>The Directive aims to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater which:</p> <ul style="list-style-type: none"> ▪ Prevents further deterioration and protects and enhances the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems; ▪ Promotes sustainable water use based on a long-term protection of available water resources; ▪ Aims at enhanced protection and improvement of the aquatic environment, inter alia, through specific measures for the progressive reduction of discharges, emissions and losses of priority substances 	<p>Develop policies that take account of the Directive to ensure the 'status' of water bodies is not compromised by proposed growth at allocated sites.</p>

	<p>and the cessation or phasing-out of discharges, emissions and losses of the priority hazardous substances;</p> <ul style="list-style-type: none"> ▪ Ensures the progressive reduction of pollution of groundwater and prevents its further pollution, and ▪ Contributes to mitigating the effects of floods and droughts. 	
Contaminated Land Strategy (2011)	<p>The key objectives of the Strategy are:</p> <ul style="list-style-type: none"> ▪ To protect health and the environment; ▪ To ensure compliance with, and enforcement of, the legislation; ▪ To deal with the legacy of contaminated land using the “suitable for use” approach in an ordered and prioritised way; ▪ To encourage voluntary remediation of sites by polluters or other appropriate persons; ▪ To ensure that procedures are in place for the open provision of information to the public, developers etc; ▪ To address the liability issues associated with the Council’s existing land holdings and avoid any new liability issues associated with land acquisitions. 	<p>The aims and objectives of the Strategy can inform the Sustainability Appraisal process using register and lists of actual and potentially contaminated land to ensure the Local Plan Review policies support development in sustainable locations and protect human health and the environment.</p>
National Planning Policy for Waste (2014)	<p>The Waste Management Plan for England sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management. Positive planning plays a pivotal role in delivering this country’s waste ambitions through:</p> <ul style="list-style-type: none"> ▪ Delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy (see Appendix A); ▪ Ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, 	<p>All local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management.</p>

	<p>recognising the positive contribution that waste management can make to the development of sustainable communities;</p> <ul style="list-style-type: none"> ▪ Providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle²; ▪ Helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and ▪ Ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste. <p>This document sets out detailed waste planning policies. It should be read in conjunction with the National Planning Policy Framework, the Waste Management Plan for England and National Policy Statements for Waste Water and Hazardous Waste, or any successor documents.</p>	
<p>Devon Waste Local Plan 2011 - 2031 (2014)</p>	<p>The Devon Waste Plan provides the policy framework for decisions by Devon County Council on planning applications for waste management development over the period to 2031, and builds on the progress made since adoption of the previous Waste Local Plan in 2006.</p> <p>The area covered by the Devon Waste Plan is that for which Devon County Council is the waste planning authority, which excludes Plymouth, Torbay and the National Parks of Dartmoor and Exmoor. However, development of the Waste Plan has had close regard to</p>	<p>The Local Plan Review should address cross-boundary waste issues.</p>

	Devon's relationships with these and other neighbouring areas to ensure that cross-boundary waste issues are addressed.	
South Devon and Dorset Shoreline Management Plan SMP 2 (2011)	<p>A Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner</p> <p>The objectives of the SMP are as follows:</p> <ul style="list-style-type: none"> ▪ to define, in general terms, the risks to people and the developed, historic and natural environment as a result of coastal evolution and behaviour within the SMP area over the next century; ▪ to identify the preferred policies for managing those risks, together with the reasoning behind the choice of those policies; ▪ to identify the consequences of implementing the preferred policies; ▪ to inform planners, developers and others of the risks of coastal evolution and of the preferred policies when considering future development of the shoreline, land use changes and wider strategic planning; ▪ to comply with international and national nature conservation legislation and biodiversity obligations; ▪ to set out procedures for monitoring the effectiveness of the SMP policies; and ▪ to highlight areas where knowledge gaps exist. 	The Local Plan Review will need to take into account the aims objectives of the Plan.
Climate change		
Climate Change Act (2008)	<p>Two key aims underpinning the Act:</p> <ul style="list-style-type: none"> ▪ to improve carbon management and help the transition towards a low carbon economy in the UK; and 	The Local Plan Review policies must reflect the objectives of the Climate Change Act, in order to contribute to reducing UK carbon emissions.

	<ul style="list-style-type: none"> to demonstrate strong UK leadership internationally, signalling that we are committed to taking our share of responsibility for reducing global emissions in the context of developing negotiations on a post-2012 global agreement at Copenhagen next year. 	
The Clean Growth Strategy (2017)	<p>The Strategy sets out a comprehensive set of policies and proposals that aim to accelerate the pace of “clean growth”, i.e. deliver increased economic growth and decreased greenhouse gas emissions.</p> <p>Key Policies and Proposals in the Strategy:</p> <ul style="list-style-type: none"> Accelerating Clean Growth Improving Business and Industry Efficiency – 25% of UK Emissions Improving Our Homes – 13% of UK Emissions Accelerating the Shift to Low Carbon Transport – 24% of UK Emissions Delivering Clean, Smart, Flexible Power – 21% of UK Emissions Enhancing the Benefits and Value of Our Natural Resources – 15% of UK Emissions Leading in the Public Sector – 2% of UK Emissions Government Leadership in Driving Clean Growth 	The Local Plan Review and sustainability appraisal will need to have regard to it.
Torbay Energy and Climate Change Strategy (2014-2019)	<p>Energy and Climate Change Policy 5 Planning and transport: Torbay Council will ensure local planning and transport policies contribute to tackling the causes and effects of climate change</p> <p>Energy and Climate Change Policy 6 Torbay Council’s carbon reduction target: Torbay Council will aim to reduce its energy consumption and carbon emissions in line with national targets whilst delivering council services and efficiently managing its assets and estate</p> <p>Torbay Council has set local targets on carbon reduction which have been derived from the legally binding UK targets. To plan for the</p>	The Local Plan Review and sustainability appraisal will need to have regard to it.

	emissions reduction ‘journey’ to 2050 in Torbay, interim targets help to gauge progress along the way. The Torbay 1990 carbon emission baseline was established in the 2008 Climate Change Strategy at 746.5Kt CO2 e.	
Biodiversity		
A Green Future: Our 25 Year Plan to Improve the Environment (2018)	<p>The 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.</p> <p>The Plan objectives:</p> <ul style="list-style-type: none"> ▪ Using and managing land sustainably ▪ Recovering nature and enhancing the beauty of landscapes ▪ Connecting people with the environment to improve health and wellbeing ▪ Increasing resource efficiency, and reducing pollution and waste ▪ Securing clean, productive and biologically diverse seas and oceans ▪ Protecting and improving the global environment 	The Local Plan Review and sustainability appraisal will need to have regard to it.
Natural Environment and Rural Communities (NERC) Act (2006)	An Act to make provision about bodies concerned with the natural environment and rural communities; to make provision in connection with wildlife, sites of special scientific interest, National Parks and the Broads; to amend the law relating to rights of way; to make provision as to the Inland Waterways Amenity Advisory Council; to provide for flexible administrative arrangements in connection with functions relating to the environment and rural affairs and certain other functions; and for connected purposes.	The NERC Act introduced a duty requiring public authorities to “have regard” to biodiversity when exercising their functions.

<p>South Inshore and South Offshore Marine Plan (2018)</p>	<p>The South Marine Plan introduces a strategic approach to planning within the inshore and offshore waters between Folkestone in Kent and the river Dart in Devon. It provides a clear, evidence-based approach to inform decision-making by marine users and regulators on where activities might take place within the marine plan area.</p> <p>Objective 1: To encourage effective use of space to support existing, and future sustainable economic activity through co-existence, mitigation of conflicts and minimisation of development footprints.</p> <p>Objective 2: To manage existing, and aid the provision of new, infrastructure supporting marine and terrestrial activity.</p> <p>Objective 3: To support diversification of activities which improve socio-economic conditions in coastal communities.</p> <p>Objective 4: To support marine activities that increase or enhance employment opportunities at all skills levels among the workforce of coastal communities, particularly where they support existing or developing industries within the south marine plan areas.</p> <p>Objective 5: To avoid, minimise, mitigate displacement of marine activities, particularly where of importance to adjacent coastal communities, and where this is not practical to make sure significant adverse impacts on social benefits are avoided.</p> <p>Objective 6: To maintain and enhance inclusive public access to, and within, the south marine plan areas appropriate to its setting.</p> <p>Objective 7: To support the reduction of the environmental, social and economic impacts of climate change, through encouraging the implementation of mitigation and adaptation measures that:</p>	<p>The Local Plan Review & SA should have regard to the Plan</p>
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	<ul style="list-style-type: none"> ▪ avoid proposals' indirect contributions to greenhouse gas emissions ▪ reduce vulnerability ▪ improve resilience to climate and coastal change ▪ consider habitats that provide related ecosystem services ▪ Objective 8: To identify and conserve heritage assets that are significant to the historic environment of the south marine plan areas. <p>Objective 9: To consider the seascape and its constituent marine character and visual resource and the landscape of the south marine plan areas.</p> <p>Objective 10: To support marine protected area objectives and a well-managed ecologically coherent network with enhanced resilience and capability to adapt to change.</p> <p>Objective 11: To complement and contribute to the achievement or maintenance of Good Ecological Status or Potential under the Water Framework Directive and Good Environmental Status under the Marine Strategy Framework Directive, with respect to descriptors for marine litter, non-indigenous species and underwater noise.</p> <p>Objective 12: To safeguard space for, and improve the quality of, the natural marine environment, including to enable continued provision of ecosystem goods and services, particularly in relation to coastal and seabed habitats, fisheries and cumulative impacts on highly mobile species.</p>	
<p>The Conservation of Habitats and Species Regulations 2017 (as amended)</p>	<p>The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species' and the adaptation of planning and other controls for the protection of European Sites.</p>	<p>The Local Plan Review policies will be required for the conservation and enhancement of biodiversity of European sites.</p>

<p>Biodiversity Net Gain – Principles and Guidance for UK Construction and Developments 2016</p>	<p>Biodiversity net gain is an approach which aims to leave the natural environment in a measurably better state than beforehand. It has the potential to provide many wide-ranging benefits, such as an increase in green space leading to improvements in human health and wellbeing. The introduction of a mandatory net gain, suggested ten per cent minimum gain as the lowest acceptable minimum and proposed Biodiversity metric as a system of measuring biodiversity losses and gains, via assessments of the value of a habitat to wildlife</p> <p>A commitment to good practice in planning methodology. This includes the Mitigation Hierarchy, which states that loss of, and damage to habitats should be avoided wherever possible. However, where this is not immediately achievable the principle holds that the loss or damage should be compensated on-site by locally-sourced gains, by using a tariff, or by achieving matching biodiversity gains elsewhere.</p>	<p>The Local Plan Review should reflect the commitment to increasing biodiversity</p>
<p>Cultural Heritage and Landscape</p>		
<p>Devon Landscape Character Assessment</p>	<p>Devon’s landscape character assessment (DLCA) describes the variations in character between different areas and types of landscape in the county. It provides an evidence base for local development frameworks and plans, articulating what people perceive as distinctive and special about all landscapes in Devon. It also set out strategies and guidelines for the protection, management and planning of the landscape.</p> <p>A map of landscape character types that covers the geographical county of Devon (excluding Exmoor National Park) is now available. The map</p>	<p>Local Plan Review will need to take account of the finding of this assessment in particular when assessing significant effects through the SA process.</p>

	merges together the maps produced by each Devon planning authority as part of its local stage 2 landscape character assessment.	
Torbay Heritage Strategy 2021-2026	<p>The aim of the Torbay Heritage Strategy is to ensure:</p> <ul style="list-style-type: none"> ▪ people in Torbay to actively engage with and contribute to our built, natural and cultural heritage at all stages of life. ▪ heritage assets are integrated into services for all, providing opportunities for learning, creativity, enjoyment and volunteering. ▪ heritage sites are protected and enhanced to make the most of their historic, environmental and cultural value. ▪ heritage attractions are thriving within well-maintained historic townscapes and landscapes. ▪ historic buildings are reused in sustainable and imaginative ways and new developments find inspiration in a distinctive past. 	The aims and objectives of the Strategy can inform the Sustainability Appraisal process and ensure the Local Plan Review policies support development in sustainable locations and protect the local heritage
South Devon Area of outstanding Natural Beauty Management Plan (2019 - 2024)	<p>The plan purpose is to:</p> <ul style="list-style-type: none"> ▪ Highlight the special qualities and significance of the AONB; ▪ Present a vision for the future of the AONB; ▪ Set out objectives and policies to secure the vision; ▪ Identify what needs to be done, by whom and when; ▪ State the condition of the AONB and how the effectiveness of its management will be monitored; ▪ Reflect the views and aspirations of a wide range of AONB stakeholders and parties with an interest in it; ▪ Co-ordinate the work of different partner organisations. 	The Local Plan Review will need to take account of the plan.
Planning (Listed Buildings and Conservation Areas Act) 1990	<ul style="list-style-type: none"> ▪ Power to compile lists of listed buildings, or approve, with or without modifications, such lists compiled by the Historic Buildings and Monuments Commission for England or by other persons or bodies of persons, and may amend any list so compiled or approved. ▪ Power to designate Conservation Areas. 	The Local Plan Review and sustainability appraisal will need to have regard to it

Health and wellbeing		
Health and Social Care Act (2012)	The Act has introduced the first legal duties about health inequalities. It included specific duties for health bodies including the Department of Health, Public Health England, Clinical Commissioning Groups, and NHS England which require the bodies to have due regard to reducing health inequalities between the people of England. The Act also brought in changes for local authorities on public health functions.	The Local Plan Review should seek to integrate health and well-being into its policies
Torbay Sports Facilities Strategy (2014)	<p>The Strategy sets out the strategic direction and site specific priorities for the future delivery of sports facilities across Torbay until 2021. The strategy links closely with a separate Playing Pitch Strategy, which assesses current and future needs for playing pitches in Torbay and will underpin future protection, enhancement and provision of the pitch stock.</p> <p>Objectives:</p> <ul style="list-style-type: none"> ▪ To provide evidence to inform policy in the emerging Torbay Local Plan, and specifically to support Site Allocations and Development Management Policies which will protect sports facilities and their use by the community, irrespective of ownership ▪ To ensure that sports facilities are effectively managed and maintained and that best uses are made of existing resources - whether facilities, expertise and/or personnel to improve and enhance existing provision – particularly in the light of pressure on local authority budgets ▪ To provide evidence to help secure external funding for new facilities and enhancements through grant aid and also through CIL and Section 106 agreements and to inform policy in the emerging local plan, specifically to support site allocations and development management policies 	The Local Plan Review policies will need to reflect the objective set out within the strategy and support participation and growth in sport, recreation and fitness.

	<ul style="list-style-type: none"> ▪ And also, the aspiration to understand and promote participation in various sports to inform and support the work, strategies and priorities of the Council as well as local sporting organisations that are active in the area. 	
Joint Health and Wellbeing Strategy 2018-2022	<p>This strategic document has local significance as being the overarching strategy for the Torbay Health and Wellbeing Board, representing all major local health system partners. The vision is to create a healthy Torbay where individuals and communities thrive. There are 7 objectives underpinning this vision:</p> <ul style="list-style-type: none"> ▪ Promote good mental health ▪ Promote good health and prevent illness at scale ▪ Enable children to have the best start in life ▪ Build emotional resilience in young people ▪ Create places to live healthy and happy lives ▪ Support those who are living complex lives ▪ Enable people to age well <p>Specifically in relation to healthy places, further detail within the document prioritises achieving higher levels of physical activity, enabling people to maintain a healthy weight, ensuring housing and planning systems promote health and ensuring people are engaged with their own wellbeing and local community.</p>	An understanding through the SA process of the wider determinants of health needs to be developed to determine the extent to which the plan promotes healthy places and supports the local health system to deliver a healthy Torbay.
Economic aspects		
The UK's Industrial Strategy (2017)	The aim of the Industrial Strategy is to boost productivity by backing businesses to create good jobs and increase the earning power of people throughout the UK with investment in skills, industries and infrastructure.	The Local Plan Review and sustainability appraisal will need to have regard to it.

	<p>We will boost productivity and earning power across the country by focusing on the 5 foundations of productivity. Our 5 foundations support our vision for a transformed economy:</p> <p>Ideas: the world's most innovative economy</p> <p>People: good jobs and greater earning power for all</p> <p>Infrastructure: a major upgrade to the UK's infrastructure</p> <p>Business Environment: the best place to start and grow a business</p> <p>Places: prosperous communities across the UK.</p>	
Housing & Planning Act (2016)	<p>An Act to make provision about housing, estate agents, rent air charges, planning and compulsory purchase.</p> <ul style="list-style-type: none"> ▪ place a duty on local planning authorities to actively promote the development of Starter Homes and embed them in the planning system ▪ unlock brownfield land to provide homes faster, requiring local authorities to prepare, maintain and publish local registers of specified land ▪ support the doubling of the number of custom-built and self-built homes to 20,000 by 2020 ▪ ensure that every area has a Local Plan ▪ reform the compulsory purchase process to make it clearer, fairer and faster ▪ simplify and speed up neighbourhood planning 	The Local Plan Review needs to take into account this Act.
Torbay Economic Strategy (2017 – 2022)	<p>The Economic Strategy plays a key role in helping Torbay achieve its vision. It will drive sustainable growth centred on people, businesses and infrastructure.</p> <p>The objectives set out in the strategy are to:</p> <ul style="list-style-type: none"> ▪ Deliver a successful town centre regeneration programme; 	The Local Plan Review policies should support the overall Strategy objectives

	<ul style="list-style-type: none"> ▪ Continue to create an environment in which businesses and jobs can grow; ▪ Accelerate the development of employment space, geared to business needs; ▪ Raise skills levels and broaden the skills base within the workforce. 	
Heart of the South West Local Industrial strategy (2019)	<p>The vision for the Heart of the South West economy, as set out in the productivity strategy is to “raise productivity in order to drive prosperity for all”</p> <p>Clean Growth is the central tenet of this Local Industrial Strategy, a Strategy which sets out how the Heart of the South West will enable its businesses and people to capitalise on the new opportunities. This will be achieved whilst driving clean growth and ensuring that the proceeds of that growth are more equitably shared across the area. The core mission of this Local Industrial Strategy therefore is to “transform the economy through Clean Growth”</p> <p>This will be achieved through five key priorities:</p> <ul style="list-style-type: none"> ▪ Clean businesses ▪ Clean communities ▪ Clean technologies ▪ Clean thinking ▪ Clean and green 	<p>The Local Plan Review and sustainability appraisal will need to have regard to it.</p>
English Riviera Destination Management Plan (2017 – 2022)	<p>The Plan seeks to:</p> <ul style="list-style-type: none"> ▪ Increase year round growth in numbers for UK domestic and international visitors ▪ Extend the current season beyond the school holidays ▪ Attract new international and UK visitors ▪ Increase visitor spend 	<p>The Local Plan Review will need to take account of the plan.</p>

	<ul style="list-style-type: none"> ▪ Attract investment and re-investment into the Torbay ▪ Ensure sustainable delivery of marketing activity for the destination ▪ Raise skills levels in the sector 	
Local Transport Plan - Devon and Torbay Strategy 2011 – 2026, Torbay Council (2011)	<p>The Local Transport Plan 3 (LTP3) is a 15 year plan, covering the period 2011 – 2026. It aims to deliver a transport system that can meet economic, environmental and social challenges. It also seeks to deliver the aspirations of Devon & Torbay Councils, stakeholders, businesses and the public.</p> <p>The strategy has five key objectives:</p> <ul style="list-style-type: none"> ▪ Deliver and support new development and economic growth ▪ Make best use of the transport network and protect the existing transport asset by prioritising maintenance ▪ Work with communities to provide safe, sustainable and low carbon transport choices ▪ Strengthen and improve the public transport network ▪ Make Devon the ‘Place to be naturally active’ 	The Local Plan Review policies should enhance public transport provision and encourage active modes of travel such as walking and cycling
Tor Bay Port Masterplan and Addendum (2019 - 2024)	<p>This Port Masterplan is a high level framework document that provides overall strategic spatial development guidance on the most sustainable future for Tor Bay Harbour and its three enclosed ports. It is not meant to include detailed plans of developments for implantation but instead provides flexibility for development over the longer term. It is also designed to communicate the Harbour Authority’s aspirations to the wider community and other planning bodies to ensure that future harbour development remains coherent with change delivered through the Torbay Local Plan, Neighbourhood Plans and other regional and local strategies.</p>	The aims and objectives of the strategy should be reflected in the Local Plan Review.
Social aspects		

<p>Communication, Consultation and Engagement Strategy (2016 – 2020)</p>	<p>The aim of this Communication, Consultation and Engagement Strategy is to set out the principles within which Torbay Council will communicate and involve local people across Torbay.</p> <p>In order to meet these aims we will deliver the following objectives:</p> <ul style="list-style-type: none"> ▪ Be open and transparent when communicating with all stakeholders. ▪ Ensure all communication is two way – listen to stakeholders and communicate back the actions we have taken. ▪ Use a range of communication methods and channels to provide our stakeholders with information about council activities in order to signpost residents and other stakeholders to the right services and, where appropriate, help them to resolve their own issues to reduce demand on council services. ▪ Engage and communicate with our communities and stakeholders in a timely way so they are informed and are able to have their say on local decision making issues. ▪ Be realistic about our limitations and the need for the council to use reducing resources to best effect. ▪ Use an integrated and joined up approach, both within the council and with our partners, to achieve value for money, to avoid consultation fatigue and to ensure messages are consistent. ▪ Provide good internal communication, consultation and engagement to improve employee morale, increase performance and to enable staff to understand and demonstrate the council’s core values. 	<p>The aims and objectives of the strategy should be reflected in the Local Plan Review and SA.</p>
<p>ENJOY, TALK, DO, BE A cultural strategy for Torbay</p>	<p>The aims of the Strategy:</p> <p>Aim one: to increase engagement and participation in cultural opportunities in Torbay</p>	<p>The aims and objectives of the strategy should be reflected in the Local Plan Review</p>

<p>and its communities (2014 -2024)</p>	<ul style="list-style-type: none"> ▪ build from the community as well as bringing in new and diverse experiences ▪ support creative and cultural learning ▪ harness the health and wellbeing benefits of culture <p>Aim two: to maximise the distinctive natural and built cultural assets of Torbay</p> <ul style="list-style-type: none"> ▪ protect, enhance and utilise cultural places and spaces for culture ▪ develop a year-round season-based rhythm of cultural events ▪ contribute to safe and sustainable living, working and visiting <p>Aim three: to ensure joined-up cultural development is a key contributor to economic and social development in Torbay</p> <ul style="list-style-type: none"> ▪ strengthen support for the creative and cultural economy and the advantages it brings ▪ share knowledge, skills and resources to diversify and grow the income base ▪ make links with and culture proof other policies, strategies and plans 	
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Appendix B: Baseline Information

1. Introduction

The term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. This information will enable the potential effects of the implementation of the plan to be assessed in the context of existing and potential environmental, economic and social trends.

A robust understanding of the baseline position is important in ensuring a sound evidence base for the plan. Baseline information can also help to identify sustainability problems which the plan should seek to address and also provides the basis for predicting the effects of different options for the plan. It can also be used as a benchmark to monitor the likely significant effects of implementing the plan.

This baseline information covers social, environmental and economic characteristics of the Torbay area. It also complies with the SEA topics such as air quality, biodiversity, climatic factors, cultural heritage and landscape, energy, material assets, population and human health, transport, waste, water and soil and also includes economy, infrastructure and social inclusion.

2. Context

Torbay is one of nine unitary authorities in the South West. It comprises the three towns of Torquay, Paignton and Brixham which stretch around a sheltered bay on the south coast of Devon (figure 3). The area surrounding Torbay is characterised by a mix of small farms, orchards, a number of caravan sites, industrial estates and seasonal tourist accommodation. Torbay had an estimated resident population of 135,800⁴ in 2018; in addition, Torbay experiences significant increases in population at peak times in the tourist season. Torbay's unspoilt coastline offers some 20 safe beaches and secluded coves along a 27 mile stretch, aptly named "The English

4 NOMIS, 2018

Riviera”. Torbay is a touring centre for the wider area and as a result of its concentration of natural and developed attractions and facilities it attracts holiday makers staying outside Torbay. It also has one of the nation’s leading fishing ports at Brixham and concentration of light industries and other services, mainly on the edge of Paignton.



Figure 3: An overview of the Torbay area

The latest ONS projections (2018 based, published 2020) project that Torbay's population will grow by 17,300 people, to 153,100 by 2043. This growth is entirely driven by (largely domestic) migration and the natural rate of change would be a decline in the population by about 22,000 people by 2043 if no migration occurred, as shown in figure 4. The core 2018 based Sub National Population Projections are higher than the previous (2014 and 2016 based) projections, as shown in figure 5. However, because population growth is driven by migration, different migration assumptions make a very big difference in the overall picture, as shown in figure 6.

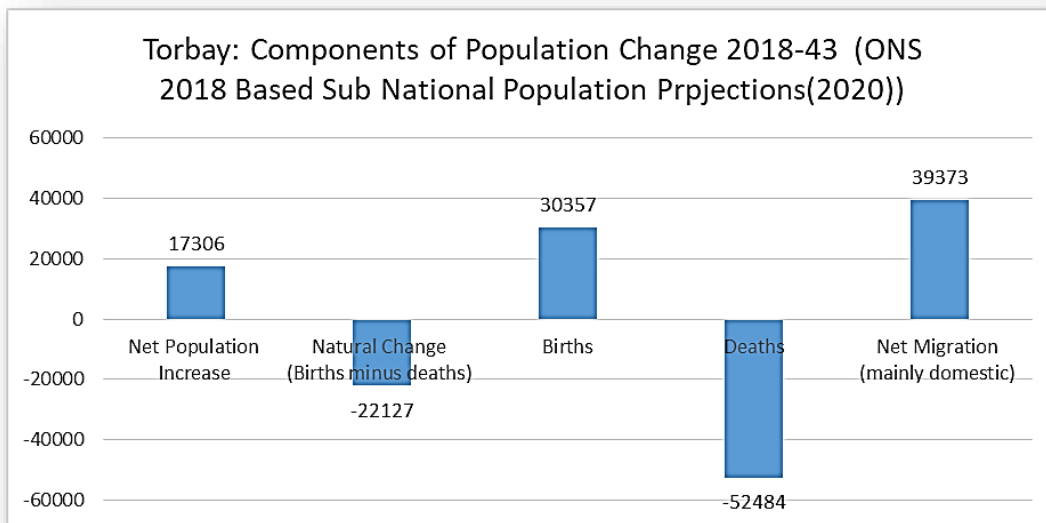


Figure 4: component of population change 2018 – 2043

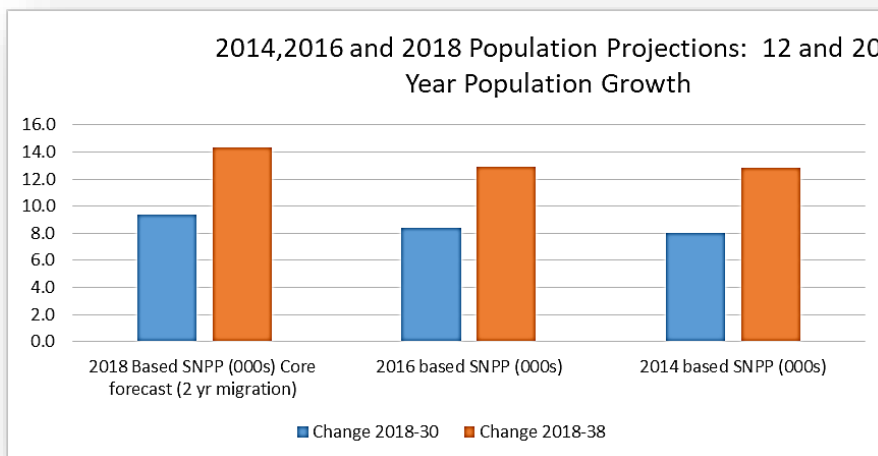


Figure 5: 12 and 20 years population growth

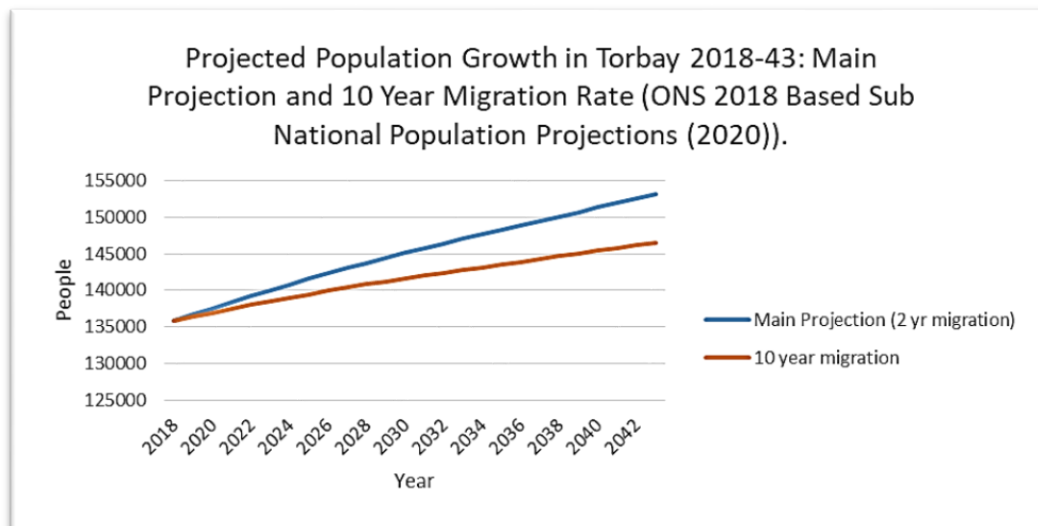


Figure 6: Main projection and 20 year migration rate

3. Environmental Characteristics

3.1 Biodiversity

Torbay supports a variety of wildlife rich habitats and species which are protected under domestic or European legislations (table 5 and figure 7). There are 7 Special Areas of Conservation (SAC) within a 20km radius of Torbay, and two within Torbay namely the South Hams SAC and the Lyme Bay and Torbay Marine SAC. The South Hams SAC stretches from Berry Head to Sharkham Point; it is designated for a number of reasons including its calcareous grassland and greater horseshoe bats. A significant area of Torbay and its rural hinterland are within the Sustainment Zone and Landscape Connectivity Zone for greater horseshoe bats (figure 8).

Table 5: Torbay’s designated sites

Site Designation	Number of Sites
Special Area of Conservation (SAC)	2
National Nature Reserve (NNR)	1
Marine Conservation Zone	1
Site of Special Scientific Interest (SSSI)	12

Local Nature Reserve (LNR)	3
County Wildlife Sites (CWS)	30
Other Sites of Wildlife Interest (OSWI)	59
Ancient woodland inventory (AWI)	5
Regionally Important Geological Sites (RIGS)	15
Unconfirmed Wildlife Sites (UWS)	10

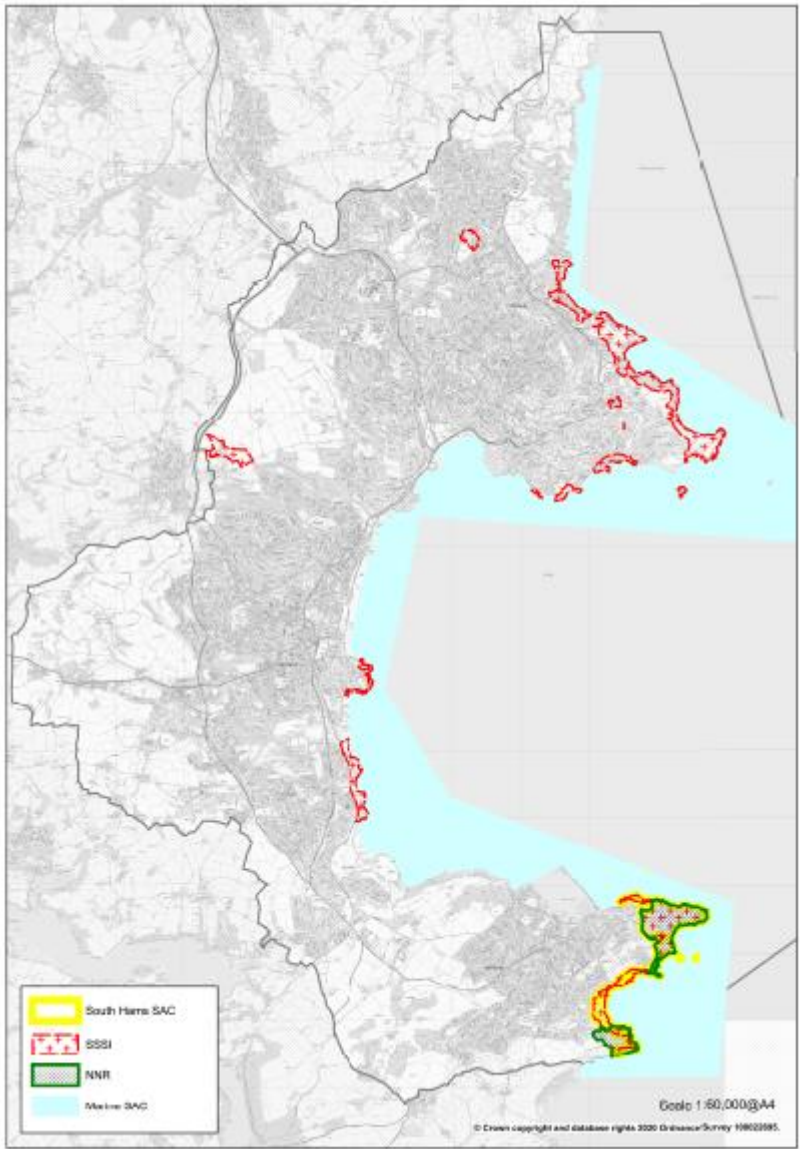


Figure 7: International and national nature conservation sites within Torbay

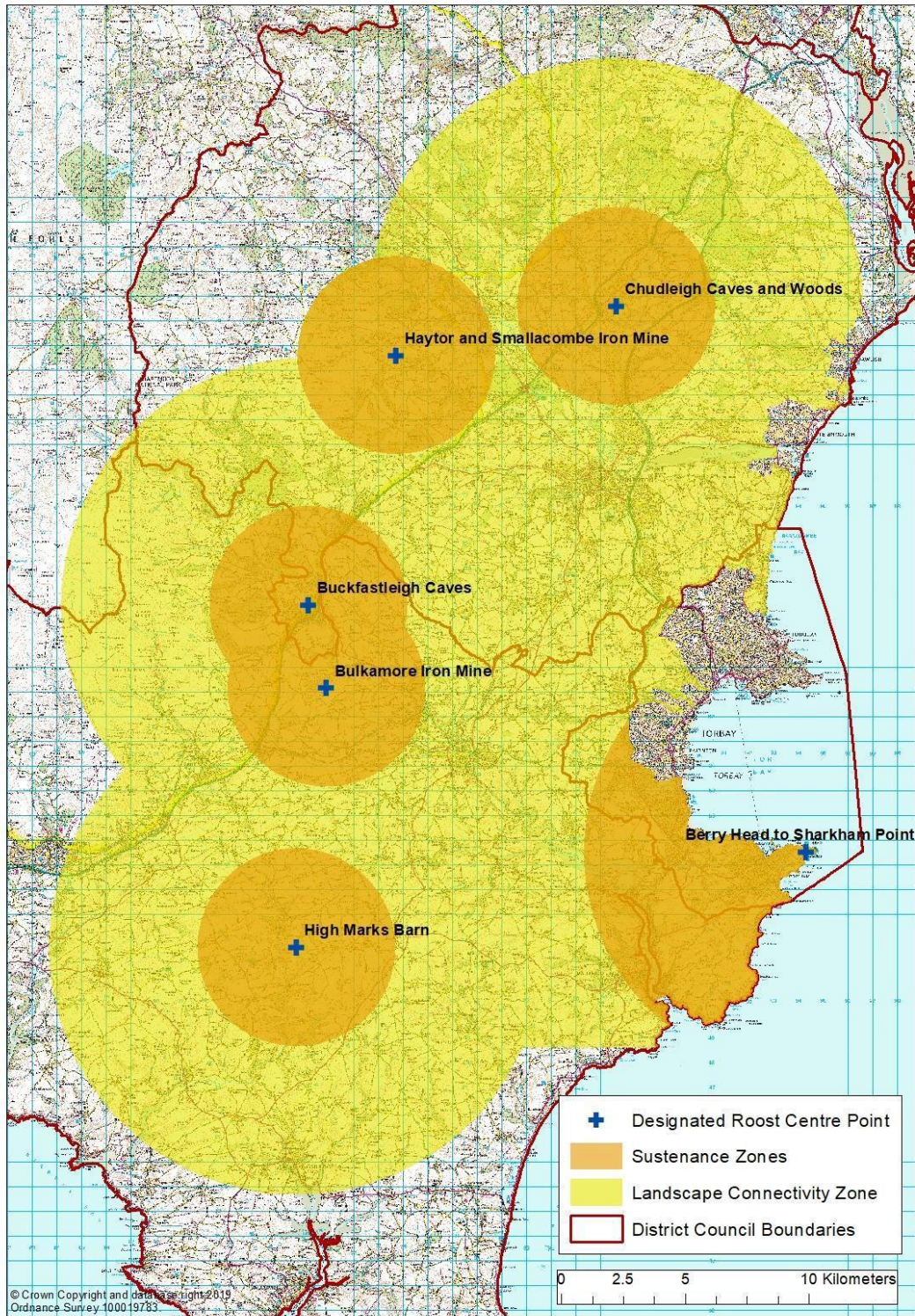


Figure 8: South Hams SAC consultation zone

The Lyme Bay and Torbay Marine SAC is situated mostly within the Western English Channel and Celtic Regional Sea and lies off the south coast of England off the

counties of Dorset and Devon. The site comprises of two main areas containing Annex I 'reef' and 'sea cave' habitat.

There are a number of endangered bird species in Torbay. The most endangered are those listed in Annex 1 of the EC Birds Directive and species that are listed as UK Birds of Conservation Concern (BOCC).

Marine Conservation Zones (MCZ) are areas that protect a range of nationally important, rare or threatened habitats and species. Torbay MCZ is an inshore site located in the south west of the UK that was designated in November 2013 (figure 9). The site covers an area of coastline in South Devon between Oddicombe Beach and Sharkham Point, protecting a total area of approximately 20km². Beginning at the coastline, the boundary extends 1 to 2.5km out to sea and includes Hope's Nose near Torquay and Berry Head near Brixham⁵.

Future trends: Population growth requiring more housing and infrastructure and consumption of natural resources, along with changes in land use and climate change which will continue to place pressure on the wildlife and ecosystems in Torbay. Without positive protection, conservation and enhancement, existing species and habitats will decline in quality and extent, and the value of nature for people's appreciation and enjoyment, will be diminished.

⁵ Torbay Marine Conservation Zone, Defra 2019

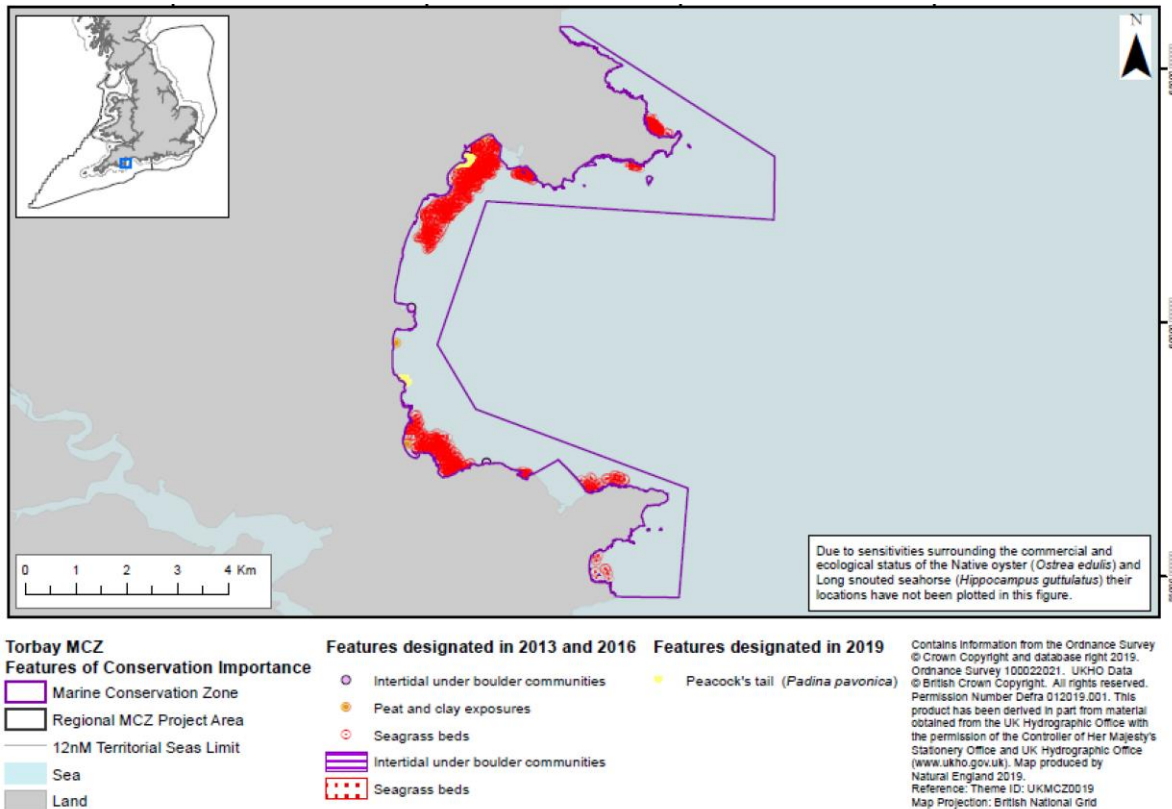


Figure 9: Marine habitats and species that are known to be rare, threatened or declining

3.2 Climatic Factors

The Climate Change Act requires the UK to reduce its greenhouse gas emissions to net zero by 2050. This means greenhouse gas emissions falling from around 14 tonnes per person in 1990 to 0 tonnes per person in 2050. To ensure steady progress towards the 2050 goal, the Climate Change Act requires the Government to set intermediate targets called ‘carbon budgets’. These are caps on the greenhouse gas emissions that can be emitted across the UK during a five-year period. Five carbon budgets have been set to date, putting in place caps on greenhouse gas emissions from 2008 to 2032. In July 2016, the UK set the fifth carbon budget, which requires a 57% average reduction in emissions over 2028-32 across the UK compared to a 1990 baseline⁶.

⁶ The Clean Growth Strategy 2017

Torbay has reduced its emissions by around 45% since 1990 but there will need to be considerable activity through national and local measures in order to meet the national targets of net zero by 2050⁷. The Energy and Climate Change Strategy requires local planning and transport policies to contribute to tackling the causes and effects of climate change. The Strategy states that Torbay Council will aim to reduce its energy consumption and carbon emissions in line with national targets whilst delivering council services and efficiently managing its assets and estate.

CO₂ emissions in Torbay are dominated by domestic emissions (41%)⁸. However, emission levels per person are markedly lower in Torbay than in the South West and England (figure 10). This could be due to a mild micro-climate, a high level of economic self-containment as well as denser urban geography and an economic profile that is not reliant on energy intensive sectors.

The effects of climate change and its implications for Torbay have been assessed as part of the Climate Change Strategy for Torbay 2008 – 2013 as well as the Local Climate Impacts Profile (LCLIP). Climate change in the Bay is predicted to cause warmer wetter winters; hotter drier summers; rising sea levels; and more intense storms and extreme weather events. Torbay Council plans to review and update its Climate Change Strategy during 2020 and is also part of a Devon Climate Emergency Response Group, working with partners across the Devon region to produce a joined-up plan of how Devon can get to net zero emissions.

⁷ Energy and Climate Change Strategy 2014-2019

⁸ Local Authority Carbon Dioxide Emissions Estimates 2015, Statistical Release: National Statistics 2017

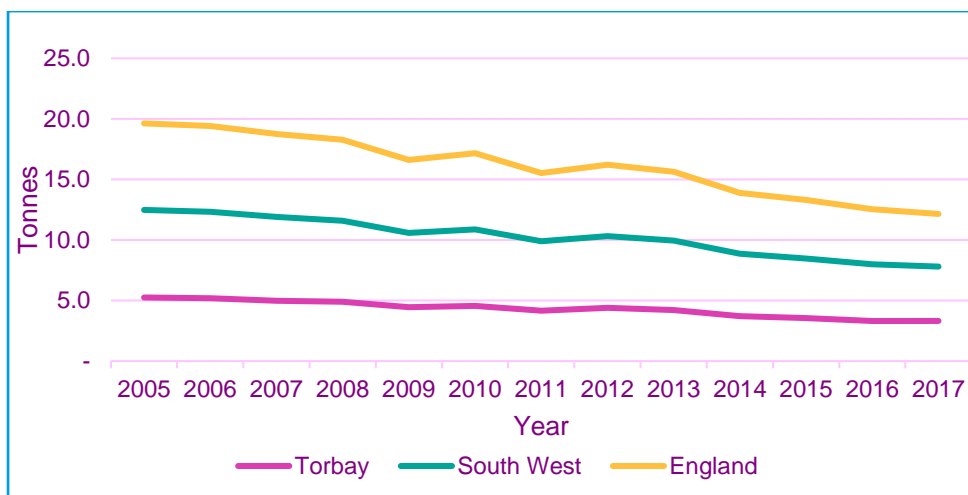


Figure 10: Carbon dioxide emissions per person⁹

Future trends: Climate change will be a key issue for the Local Plan Review to address persistently. The measures taken to respond to climate change can take many years, so it is important to develop flexible policy solutions to deal with the range of future weather conditions and possible new knowledge and technologies. Infrastructure is particularly vulnerable to these changes through disruption, reduction in capacity or efficiency and impacts on design life of infrastructure and the services it provides.

There is a need to reduce impacts on climate change through reduced emission of greenhouse gases, consumption of natural resources, and vehicular movements. In addition, more sustainable designs are required to mitigate and adapt to the physical, financial and economic impacts of a potential rise in flooding and overall temperatures.

3.3 Air Quality

Air quality in Torbay is generally good, meeting six out of seven air quality objectives specified in the Air Quality Regulations 2000. Torbay has relatively low levels of industrial activity, and therefore traffic forms the main source of air pollution in the

⁹ UK local authority and regional carbon dioxide emissions national statistics

area, in particular levels of nitrogen dioxide (NO₂). The problem is exacerbated in the summer months when roads are placed under additional strain by a high number of visitors and tourists.

The current values¹⁰ for NO₂ are a 1-hour level of 200µg/m³ and an annual average of 40µg/m³. The immediate air quality challenge is to reduce emissions of nitrogen oxides in areas where concentrations of this harmful gas currently exceed legal limits. The government has already committed more than £3.5 billion to tackle poor air quality through cleaner road transport and is working closely with local authorities and Local Economic Partnerships to make progress¹¹. Alongside this, the government is committed to cutting air pollution from all forms of transport.

There are two declared Air Quality Management Areas (AQMAs) in Torbay – Hele Road in Torquay and New Road in Brixham, declared in 2005 and 2006 respectively, and are designated for excessive levels of nitrogen dioxide (NO₂).

Future trends: Land-use planning has an essential role in improving local air quality. Spatial planning can provide for more sustainable transport links between the home, workplace, educational, retail and leisure facilities, and identify appropriate locations for potentially polluting industrial development. Any new development has the potential to impact on the road network due to an increase in the number of trips made by car. As such public transport accessibility has an important role to play in maintaining Torbay's air quality.

3.4 Cultural Heritage

The local distinctiveness of Torbay's historic areas is fundamental in maintaining its role as a tourist resort, with tourism being a significant sector of the local economy. Local Heritage is promoted through the three registered museums, Torquay Museum, Brixham Heritage Museum and Torre Abbey.

¹⁰ The Air Quality (England) Regulations 2015

¹¹ Clean Air Strategy 2019

Torbay, with its rich urban heritage, contains 24 conservation areas which have been designated due to their special architectural or historic character and should be preserved and enhanced. Torquay hosts 16 conservation areas and Paignton and Brixham host 4 each.

Listed buildings are recognised to have special architectural or historic interest. They are placed in one of three grades, which give an indication of their relative importance - grade I, grade II* or grade II. There are currently 865 listed buildings in Torbay. 96% of these are Grade II listed¹².

Scheduled Monuments are important historic buildings or sites that are not used as a dwellings or for worship. There are currently 13 Scheduled Monuments in Torbay.

Registered Parks and Gardens are planned open spaces such as private gardens, town squares, parks and cemeteries. There are currently six Registered Parks and Gardens in Torbay. There are no known Protected Wrecks or other maritime heritage assets within the boundary of Torbay Council’s remit as a planning authority, which extends as far as the low water mark. Table 6 below summarises the key heritage assets in Torbay.

Table 6: Torbay’s key heritage assets

Conservation Area	Grade I listed buildings	Grade II* listed buildings	Scheduled Monuments	Registered Parks and Gardens
Torquay				
Torquay Harbour	All Saints, Babbacombe	1-15 Wellswood Park Road	Kents Cavern	Barton Road Cemetery
Warberries	Torre Abbey	163 Newton Road	Torre Abbey	Castle Tor
Lincombes	The Spanish Barn, Torre Abbey	Beacon Terrace, 2-8 Beacon Hill	prehistoric field system at Walls Hill	Princess Gardens and Royal

12 Draft Torbay Heritage Strategy 2020-2026

Conservation Area	Grade I listed buildings	Grade II* listed buildings	Scheduled Monuments	Registered Parks and Gardens
				Terrace Gardens
Chelston	Church of St John the Evangelist, Montpellier Road	Church of our Lady Help of Christians and St Dennis, Priory Road	St. Michael Chapel, Chapel Hill	Watcombe Park and Brunel Manor
Cockington		Church of St Andrew, St Efride's Road		Castle Tor
St. Marychurch		Church of St George and St Mary, Cockington Park		
Babbacombe downs		Church of St Luke, St Luke's Road, Torquay		
Maidencombe		Church of St Mary Magdalene, Union Street		
Barton		Church of St Matthew, St Matthias Church Road		
Cary Park		Church of St Matthew, St Matthew's Road		
Belgravia		Cockington Court		
Watcombe Park		D-Day embarkation slipways and adjoining linking section of quay wall, Beacon Quay		
Torre		Hatley St George, Lincombe Drive		
Tormohun		Hesketh Crescent and attached railings, 1-15 Meadfoot Road		

Conservation Area	Grade I listed buildings	Grade II* listed buildings	Scheduled Monuments	Registered Parks and Gardens
Upton		Ilsham Manor Oratory		
Abbey Road		Little Theatre, St Mark's Road		
		Manor Farmhouse, 191 – 193 Fore Street		
Paignton				
Old Paignton	Church of St John the Baptist, Church Street	Bishops Palace walls and tower	The Bishop's Palace	Oldway Mansion
Polsham Park,		Blagdon Manor	Two bowl barrows at Beacon Hill	
Roundham		Church of St Mary, Blagdon Road	Two prehistoric hilltop enclosures, a ditch system and four bowl barrows, 300m north of Barton Pines Inn.	
Shorton		Kirkham House	D-Day Landing Craft Maintenance Site on the River Dart	
		Oldway Mansion	Chambered tomb, 630m north west of Elberry Farm	
		Torbay Cinema		
Brixham				
Churston Ferrers		Aylmer, Milton Street	Ashhole Cavern	
Brixham Town		Church of St Mary the Virgin, Church Road	Berry Head Fort and complex	

Conservation Area	Grade I listed buildings	Grade II* listed buildings	Scheduled Monuments	Registered Parks and Gardens
Higher Brixham		Church of St Mary the Virgin, Drew Street	Hardy's Head Battery	
Galmpton		Churston Court	Windmill Hill Cave	
		Lupton House	The Old Redoubt and later Victorian rifle range target, south west of Berry Head Fort	
		Ramparts, counterscarp revetment, glacis, musketry wall of southern fort, Berry Head	World War II Emergency Coastal Battery and remains of a Victorian practice battery at Battery Gardens.	
		Ramparts, revetments, north battery platform, north and south musketry walls of northern fort Berry Head.		

Future trends: Heritage assets can be vulnerable to unsuitable development, lack of investment, lack of local access and heritage sector fragmentation. Unsuitable development is the most relevant to planning. This type of threat can range from large new developments that overwhelm the historic character of a whole area, to small changes to individual buildings. Over time, the incremental effect of these changes can erode the qualities that make a place special.

Torbay's heritage can inspire new development that enhances the historic environment and makes a positive contribution to local character and distinctiveness. Meanwhile, historic buildings can be protected for the future by finding new and

viable uses consistent with their conservation. Torbay Council encourages the use of traditional materials for all development and refurbishment proposals where it is appropriate to do so, including making use of materials that are locally sourced.

Development is one of the most powerful forces for change to the conservation, enhancement and enjoyment of the historic environment, and so having an understanding of the way in which the historic environment has influenced settlement patterns and the sense of place of particular areas is important in accommodating future development.

3.5 Landscape

Torbay has a unique relationship between landscapes comprising largely of seascapes, urban and rural nature (figure 11). It is the combination of these elements which make Torbay an attractive tourist resort. The bay is bounded at either end by Hopes Nose and Berry Head which comprise of hard limestone headlands. The land area covers a total of 63km², of which 32 km² is built up, leaving 31km² defined as countryside. There is 45km of coastline with over 20 public beaches and 42 km² of sea within Torbay's boundary¹³.

Torbay includes one of the highest concentrations of protected geological sites in the UK. The complex geology of the area has contributed to the designation of part of the Torbay coast as a Geopark. It is one of only six such sites in the UK and the first urban Geopark which recognises the rich geological, historical and cultural heritage where education and access to geology are recognised and promoted.

The South Devon Area of Outstanding Natural Beauty (AONB) is one of Britain's finest protected landscapes. It is an ancient countryside with strong links to the sea and generations of human activity etched into the landscape. The AONB designation for South Devon, confirmed by government in 1960, covers 340km² of coastline, estuaries and countryside. The AONB incorporates the terrestrial element of the

South Devon Heritage Coast covering 75km of AONB coastline and also includes an area of inshore waters.

The AONB is a centre for active and creative community life, a thriving and dynamic work place and a popular visitor destination. 94.5% of the AONB area is land or enclosed waterbodies. The remaining 5.5% is made up of tidal estuary waters. 98.02% of the AONB lies in the South Hams/Devon County Council, 1.95% in Torbay Council (figure 12) and 0.03% in Plymouth City Council area¹⁴.

¹⁴ South Devon Area of outstanding Natural Beauty Management Plan 2019-2024

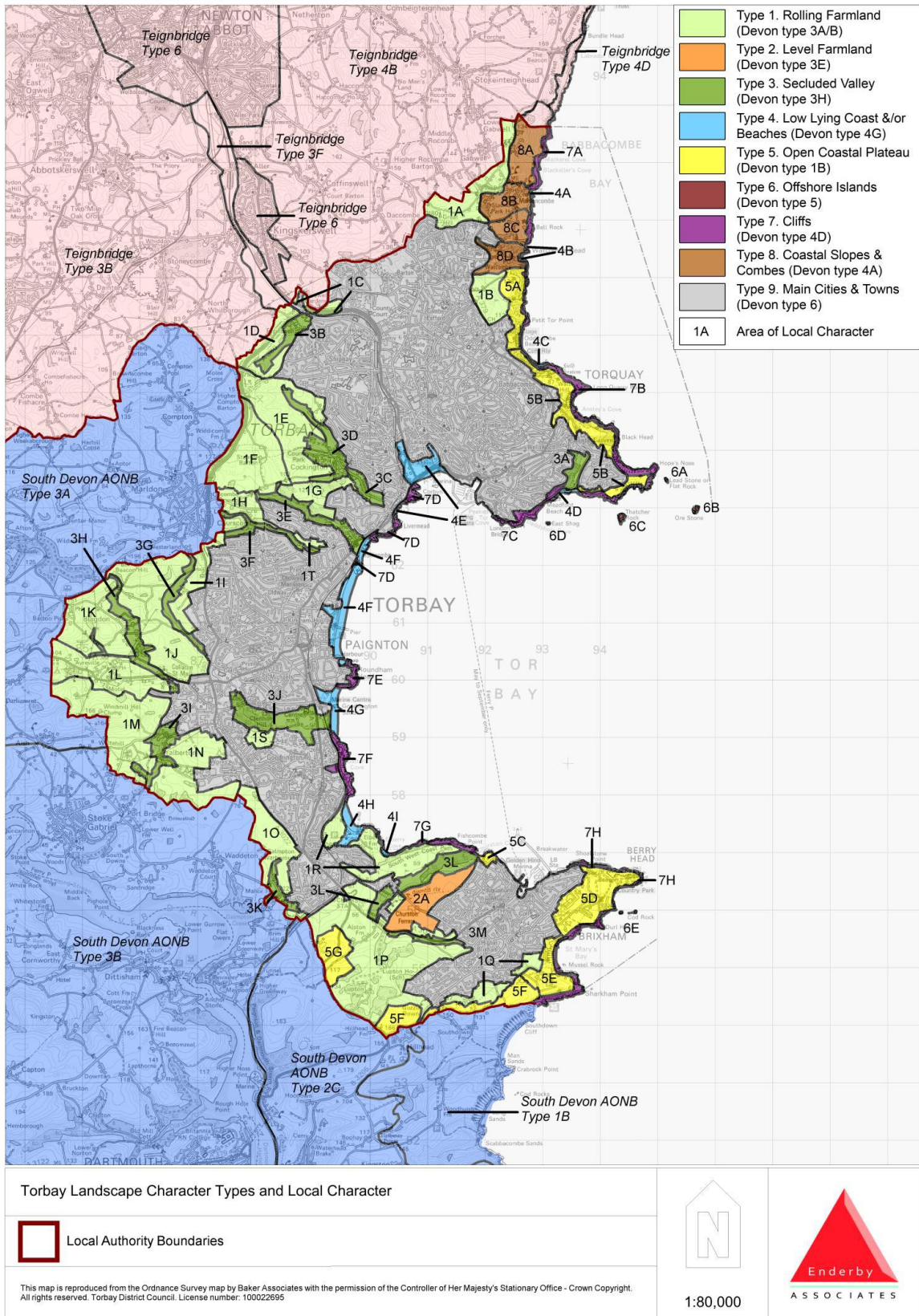


Figure 11: Torbay Landscape Character Types and Local Character

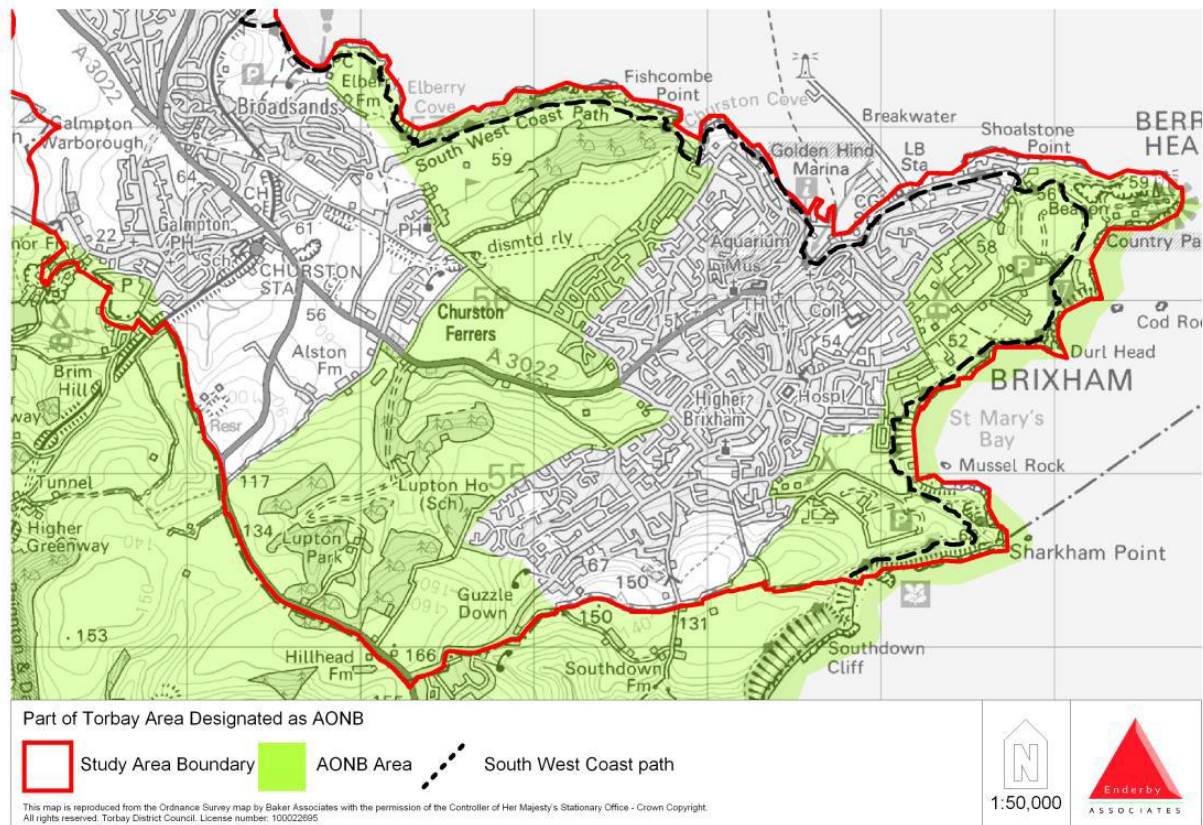


Figure 12: The Boundary of the AONB in Torbay

Townscape, landscapes and seascapes can form the settings of, and hence contribute to, the significance of heritage assets as well as being heritage assets in their own right, e.g. conservation areas, registered parks and gardens. Of the 10 assets currently on our Heritage at Risk Register for Torbay, three are registered parks and gardens and one is a conservation area.

Future trends: Development is one of the most powerful forces for change to the landscape character. The need to accommodate new housing and economic development along with its associated infrastructure is a perpetual challenge particularly in the AONB. Recognising differences in landscape character at a range of scales is essential to ensure that land management changes and decisions about new development proposals take every practical opportunity to respect and enhance the sense of place of different areas. The promotion of good design and sense of place can help ensure that change is positive and does not result in an alteration of

settlement character and identity due to the gradual erosion of local distinctiveness as traditional features are replaced with standard building materials and design.

3.6 Flood Risk

The main risks of flooding come from coastal and fluvial flooding as well as a proportion of incidents related to surface water runoff (figure 13). There are 17 watercourses in Torbay covering 42km in length, of which 13 discharge directly to the English Channel, 2 discharge to the River Dart, 1 discharges to the River Teign and 1 discharges to the public combined sewer system.

Government policy is moving towards soft engineering and avoidance of development in flood risk areas and the allowance of managed retreat. As Torbay's economy is dependent upon beaches and the directly adjacent tourist infrastructure, managed retreat is unlikely to be an option here. Instead future emphasis is aimed at prevention or minimisation of development in high-risk areas¹⁵.

Future Trends: Locating developments outside areas of flood risk is essential to avoid a legacy of economic, social and environmental costs as is maintaining existing flood risk management infrastructure and ensuring all development incorporates sustainable drainage systems to minimise surface water flood risk. Land use planning in urban areas can make an important contribution to the management of water resources as changes to the built environment have significant implications for water use and quality (as runoff or as treated wastewater). Natural Flood Management can benefit both flood alleviation and biodiversity.

15 South Devon and Dorset Shoreline Management Plan SMP 2 (2011)

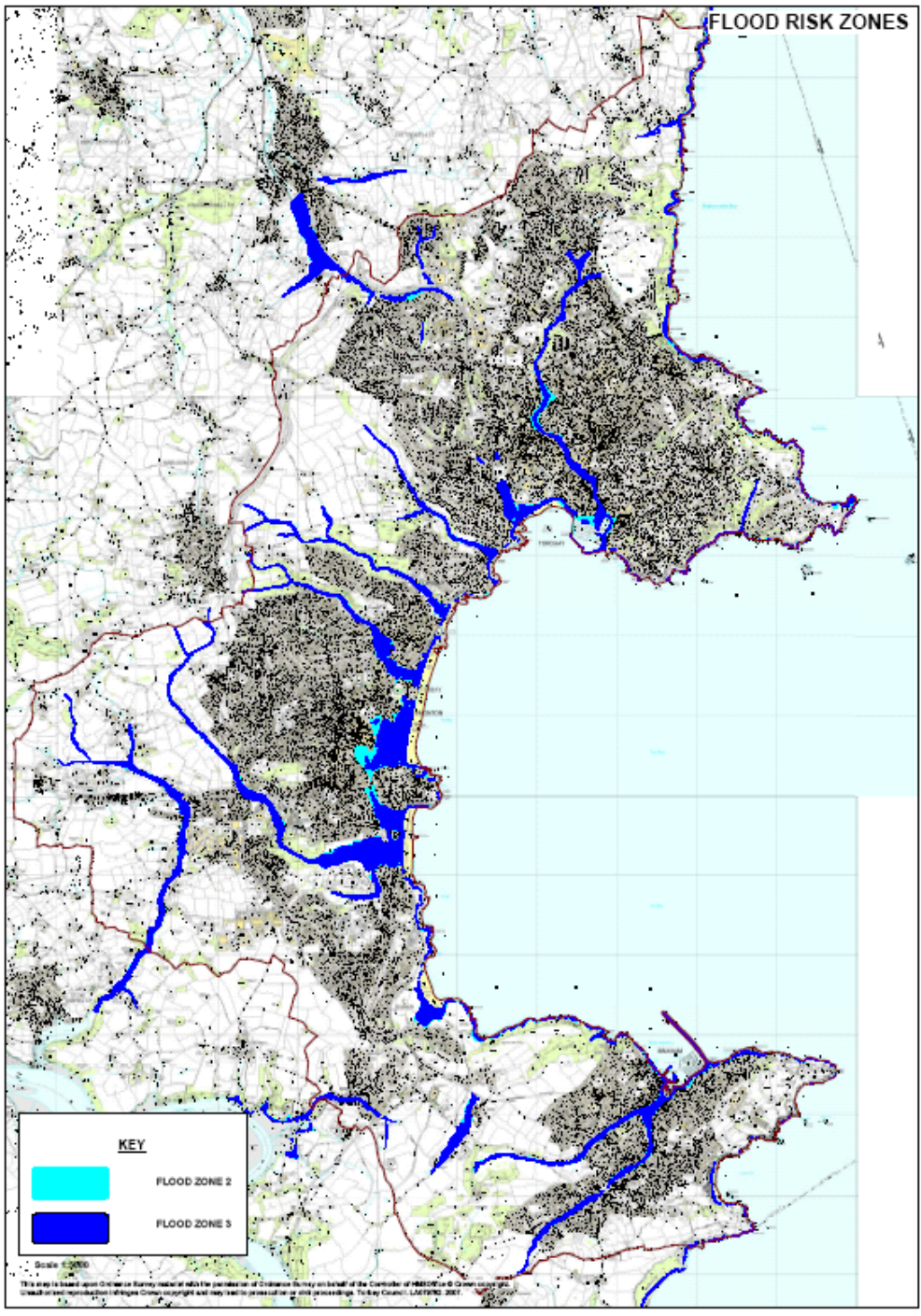


Figure 13: Watercourses and flood zones in Torbay

3.7 Drainage

Strategic improvements to the sewer network have been highlighted in the Torbay Local Plan 2012-30 (adopted 2015). These are likely to be necessary in order to

maintain the current level of service given the challenges imposed by climate change and urban creep, in addition to the substantial proposed developments.

The addition of new impermeable area caused by local changes, such as patios and conservatories, draining to the sewer network outside the proposed development areas are highly likely to cause significant detriment to the performance of the combined sewer system. This detriment is in the form of increased flooding risk and increased spills from the combined sewer overflows (CSOs) in the catchment.

Future Trends: a growing population and development pressures are placing extra demands on the sewerage treatment infrastructure and the waters receiving effluent. The New Local Plan will need to consider the increase in housing numbers in relation to point source pollution and the infrastructure.

3.8 Agricultural land

There is a limited amount of agricultural land in Torbay and so, wherever possible, the higher grades of agricultural land are preserved from development (figure 14). Torbay's largest proportion of land (3,400 hectares) is urban compared to 2,800 hectares of rural land. More than half the land which has not been built over is used for agricultural purpose. The best quality land in Torbay is to be found in Cockington (grades 2 and 3), Collaton St. Mary (grades 2 and 3), Churston (mostly grade 3, some grade 2) and Barton (mostly grade 3, some grade 2)¹⁶.

DEFRA has developed a Soil Action Plan for England (2004-2006) and A Strategy for England: Safeguarding our Soils (2009). The intention of the Action Plan and Strategy is to increase the sustainable use of soils in England and ensure that soil protection is a consideration in decisions made relating to land use planning including, inter alia, dealing with contaminated land and providing green space for communities.

¹⁶ Defra (2005) Provisional Agricultural Land Classification, Torbay unitary Authority

Future Trends: There is evidence that soil degradation is continuing in the UK and around the world despite greater awareness of the importance of soils. Building resilience of soils to a changing climate through a supportive policy framework has potential to support wider adaptation of the economy and society to climate change, for instance, the contribution of soils to coping with drought, regulating drainage of heavy rainfall, helping to prevent flooding and carbon storage. There is increasingly a better understanding of the importance of soils to sustainable agriculture and food production. Sustainable agricultural techniques and organic food production methods have increased in recent years and are predicted to continue to gain importance in the future.

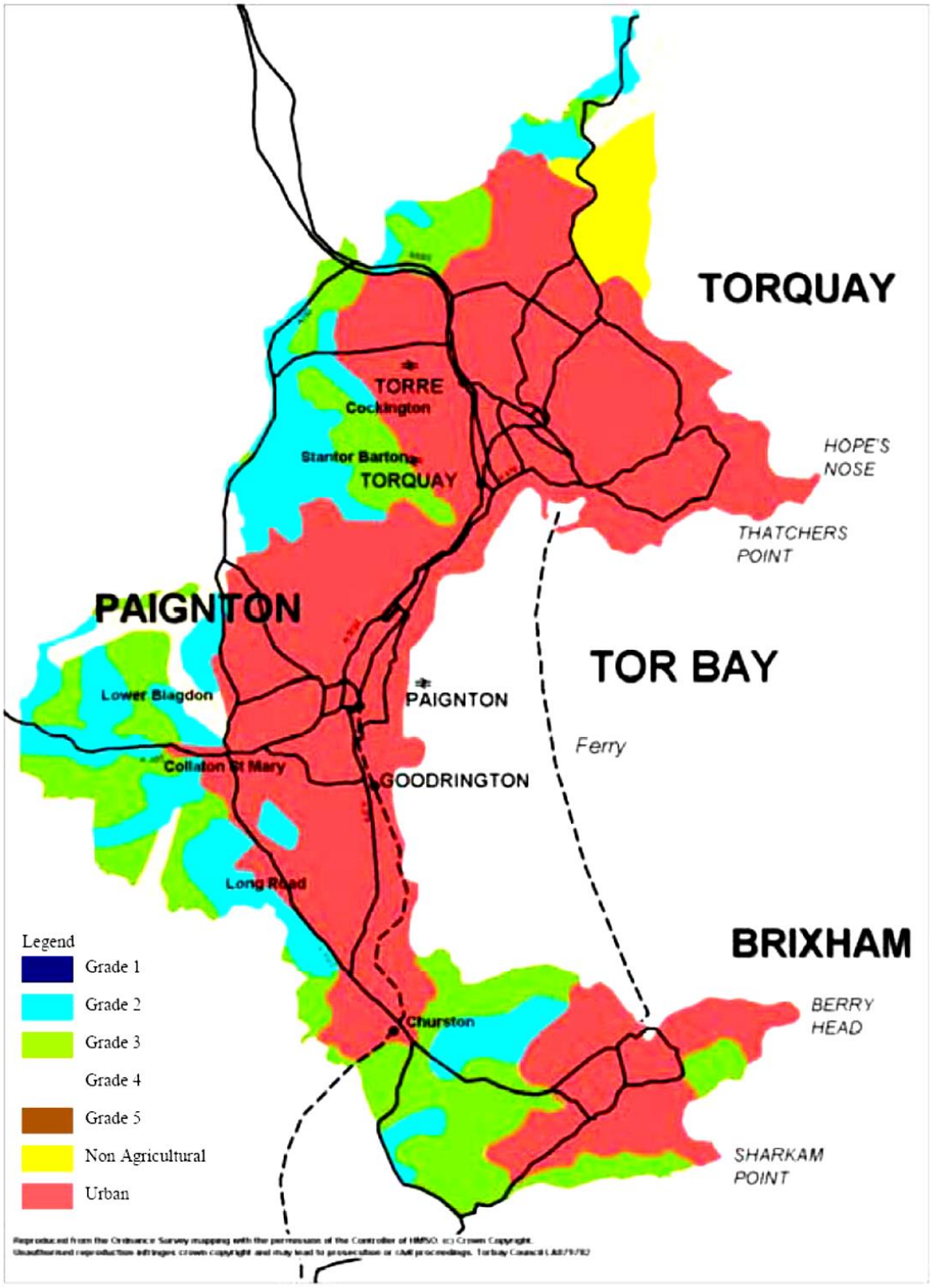


Figure 14: Agricultural land classification

3.9 Contaminated Land

Potentially contaminated sites can be broadly identified as land previously used for industrial and commercial uses, transport, mineral extraction and landfill. These can represent a risk to those who work, live or who have access to these sites.

Management of contaminated land has two impacts:

It proposes remedial work for land already contaminated, through either the planning process or, for those sites that present an immediate risk, through the powers under Environmental Protection Act Part IIA.

It enables the implementation of the correct management standards to minimise future contamination.

Historic data (Table 7) shows that contaminated sites in Torbay mostly consist of land formerly used for tipping, quarrying and pits, and some former railway and industrial land.

Table 7: Previous Use of Brownfield Land in Torbay¹⁷

Previous Use	Area (ha)	%
Vacant Land and Buildings	33.997	71.48
Industrial and Commercial*	5.6	11.77
Transport*	4.85	10.20
Minerals and Landfill*	1.4	2.94%
Residential	1.175	2.47
Community Buildings	0.54	1.14
Total	47.562	100%
Total Land potentially requiring remediation	11.85	24.91%

* Represent land potentially requiring remediation

Future Trends: Due to lack of recent data, there must be further assessment of potentially contaminated land in Torbay; either in the form of a desk top study or site

¹⁷ National Land Use Database (NLUD) (Aug, 2003) 'NLUD Previously Developed Land 2002: Regional Summary South West and Torbay Borough (UA) Council.

investigation to determine if the land is contaminated and recommend the appropriate remediation.

3.10 Waste

All waste planning authorities should identify the areas where waste sites should be located in future in order to ensure that a sustainable and integrated approach to waste management can be achieved. Torbay's geography, environmental constraints and current lack of disposal facilities within its boundaries make the delivery of such provision particularly challenging¹⁸. The Devon Waste Plan was adopted in 2014. The Plan acknowledges the lack of suitable sites in Torbay and makes provision for 40,000 Tonnes of commercial and industrial waste per annum by 2031¹⁹.

Future Trends: The UK Government is committed to continuing to move the UK towards a position where waste generation is minimised and the quantities of waste that are generated are seen as an important resource that can be re-used and recycled, and only disposed to landfill as a last resort.

3.11 Minerals

Minerals are a valuable but limited resource that can only be won where they naturally occur. Safeguarding of viable or potentially viable mineral deposits from sterilisation by surface development which would preclude their possible extraction at some future date is an important component of sustainable development.

Since the closure of Lummaton Quarry in 1989 and the more recent closure of Yalberton Quarry in Paignton, Torbay does not have any limestone quarries that remain operational. It is not probable that any of the disused quarries in Torbay will be revived for mineral extraction. Torbay is served by a number of quarries in the surrounding area such as Stoneycombe and Lindhay Hill, which have long term

18 Torbay Waste Sites Identification 2013
19 Devon Waste Plan 2011 - 2031 (2014)

reserves²⁰. It is not considered necessary for Torbay to make provision for land-won aggregate resources up to 2030.

Future Trends: Government advice is that planning authorities should make every effort to safeguard mineral deposits that are or may become of economic importance, against other types of development.

4. Economic Characteristics

4.1 Employment

Torbay faces a number of structural economic challenges. Its economy is dominated by sectors renowned for low paid, seasonal employment, such as tourism and hospitality, and health and social care. Torbay has also seen a decline in public sector employment over the past ten years. 42% of the working age population within Torbay live in an area that is amongst the 20% most deprived in relation to employment deprivation for England. The average earnings for full time workers in Torbay are significantly lower than the England average and the gap between England and Torbay average annual gross pay is some £4.3k per year²¹. In terms of income deprivation, Torbay was ranked 27th out of the 152 local authority areas in England in 2019 (figure 15). With Torbay having been ranked 32nd in 2015, this reflects a slight worsening of income deprivation relative to other local authorities in recent years.

Productivity levels in Torbay remain amongst some of the lowest in the country, mainly due to the high levels of low paid employment in the tourism and health/social care industries, along with a relatively small workforce compared to the population. In 2019 there were 2,200 unemployed residents in Torbay, representing 3.6% of the total population compared to 3.0% in the South West and 4.1% in Great Britain²².

20 The 8th Devon Local Aggregate Assessment 2020

21 Nomis, Earnings by place of residence (2019)

22 ONS 2018 -2019

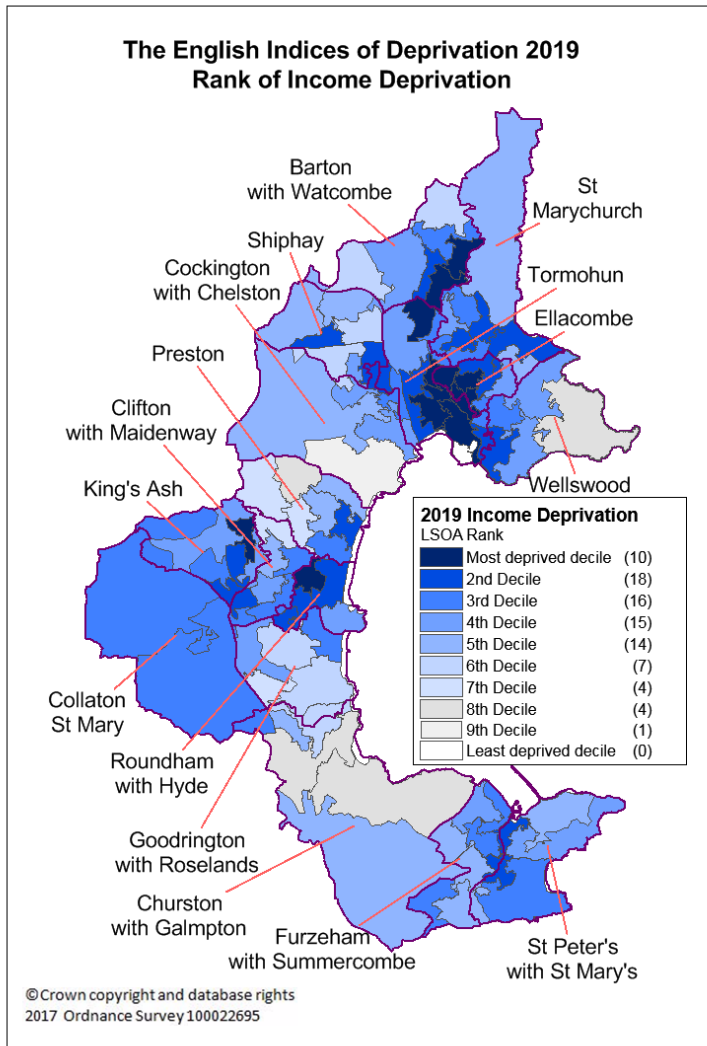


Figure 15: Rank of income deprivation 2019

In terms of Growth Value Added (GVA) per head, Torbay ranked the lowest in the South West and the 12th lowest across the whole of the UK. The gap in GVA per head across Torbay compared to the UK has continued to widen over the past 10 years (figure 16). In 2018 the GVA per head in Torbay was £14,599, 6% lower than the previous year.

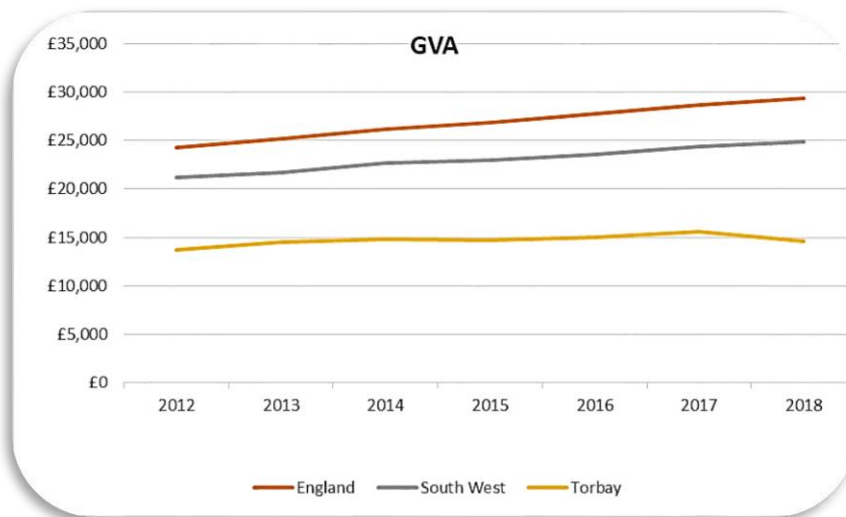


Figure 16: GVA per head of population at current basic prices²³

Survival rates of businesses in Torbay exceed the national average over the first two years of trading, however they drop below the national average in the third year, indicating a need for greater business intervention to support business' medium term growth²⁴. In terms of the UK Competitiveness Index, an integrated measure of the development and sustainability of businesses and the economic welfare of individuals, in 2019 Torbay was ranked 363rd out of 379 localities in the UK and third worst in the South West²⁵. This reflected a slight improvement compared to the ranking of 369th in 2015. Whilst there are some very large businesses based in Torbay, the vast majority of businesses are small and medium enterprises (SMEs) and cover a diverse range of sectors.

Demand for good quality serviced employment space of the right type and size remains strong in Torbay. The lack of new commercial space being developed continues to be a barrier to attracting new inward investment and limits the growth of Torbay's successful and aspirational businesses. The Torbay Development Agency argue that there is disconnect between supply and demand, resulting in the market failing to bring forward new commercial developments. This disconnect can be

²³<https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/nominalregionalgrossvalueaddedb alancedperheadandincomecomponents>

²⁴Torbay Economic Strategy 2017-2022, Evidence Base

²⁵<http://orca.cf.ac.uk/120234/1/R%20Huggins%202019%20UK%20competitive%20index%20report%20March2019.pdf>

attributed to prolonged under investment and structural shocks to the economy, as well as landowners holding out for higher residential land value.

Torbay's population growth is entirely driven by inwards migration of predominantly older people, which contributes to the ageing population. The 2018 based population projections project that between 2018 and 2043 the proportion of Torbay residents aged 70 and over will rise from 19% to 27%, whilst the proportion of working age population will fall from around 60% to 55% (even taking into account rising retirement age).

NOMIS figures suggest that the number of work-place jobs in Torbay has not risen since 2012 (the Local Plan baseline). Conversely, the number of Torbay residents in employment has risen significantly over the Plan period. This raises questions about Torbay's relationship with Greater Exeter which is the main source of employment growth in the sub-region. In addition, the Local Plan target of 5,000-5,500 additional jobs within Torbay has not been achieved, and rolling this forward is likely to result in higher housing need than assessed by the standard methodology above.

Future Trends: Torbay has one of the lowest levels of income and economic output measured in GVA per head both nationally and regionally. Whilst the low GVA is in part due to a high proportion of retired population, Torbay also has many characteristics of "left behind" seaside towns with high levels of deprivation and poor employment prospects. Improving the economic prosperity of the area whilst not damaging the area's economy will be the ultimate challenge in the coming years. It will take place in a time of yet unknown economic, social and climatic change, especially given an increasingly competitive environment in an increasingly global economy, notwithstanding Brexit and the fallout from the COVID-19 Pandemic, and the existential threat of climate change.

Economic potential can be restricted by a lack of provision of the right mix of employment land needed to meet the needs of businesses. Local skills shortages and pockets of deprivation and income inequality contribute to local employment needs and opportunities being unfulfilled. However, any solution is likely to be multi-faceted and requires a range of policy inputs.

4.2 Tourism

Tourism has been the mainstay of the Torbay economy since the mid nineteenth century. It reached its peak in the mid-1970s, with a sharp downturn in the 1980s and a slow and steady decline from the 1990s onward. There are a number of reasons for the steady decline, these include changes in public attitude towards traditional seaside holidays, unpredictable British weather, overseas competition from package holidays and a transition towards exotic holidays.

The recent interest in Torbay from both international and national hotel chains, with a number of recent planning permissions granted and starting on site (providing 600 plus additional bedroom capacity), indicates that Torbay is changing with the times to provide the type of accommodation that people expect to be available.

Future Trends: In spite of its traditional prosperous image Torbay has some serious economic problems. The economy of Torbay is largely dependent upon the tourism industry which has led to a largely seasonal, low wage economy.

4.3 Transport

Transport plays an important role in stimulating the local economy by providing fast and sustainable transport links to the rest of Devon and the UK. The Devon and Torbay Transport Plan has assessed the impacts of planned housing, retail and employment growth on the transport network and has made a commitment to a modal shift towards walking, cycling and public transport to reduce climate change impacts.

Torbay's population includes high proportions of elderly, disabled and deprived residents, and its environment is predominantly urban with an undulating topography. The key to providing improved accessibility is to bring services closer to the people who need them, to improve links by sustainable modes, and to prepare for technological changes such as electric vehicles.

Future Trends: Strategic planning seeks to achieve a balance between maintaining accessibility and reducing the environmental impact of transport on the one hand and supporting Torbay's economic regeneration on the other.

5. Social Characteristics

5.1 Population Structure

Torbay has an estimated resident population of 135,800²⁷. Population projection estimates show a relatively high growth rate for Torbay in comparison to regional and national projections, although this is driven by assumptions made about internal migration (see above). In addition to the resident population, Torbay experiences significant increases in population at peak times in the tourist season, adding a further 80,000 visitors across the bay.

Life expectancy has generally been increasing across Torbay for both males and females since 1991 and consistently remains slightly above national averages. However there is a significantly lower life expectancy in Torbay's most deprived wards compared to the most affluent ones.

Torbay has one of the highest proportions of over 65's in the South West – accounting for 25.7% of Torbay's total population as Torbay continues to be a popular retirement destination, which is common to the South West in general. By 2030, it is estimated that one in three (32%) of Torbay's population will be aged 65 years and over compared to 22.4% across England²⁸. The projected net increase in population by 2030 is entirely made up of 65+ year olds, with a small net fall in the population aged 0-64²⁹ (figure 17). This has implications for health care and service provision as well as for increasing pressures for single person households.

27 NOMIS, 2018

28 ONS , 2017

29 ONS 2018 based sub national population projections

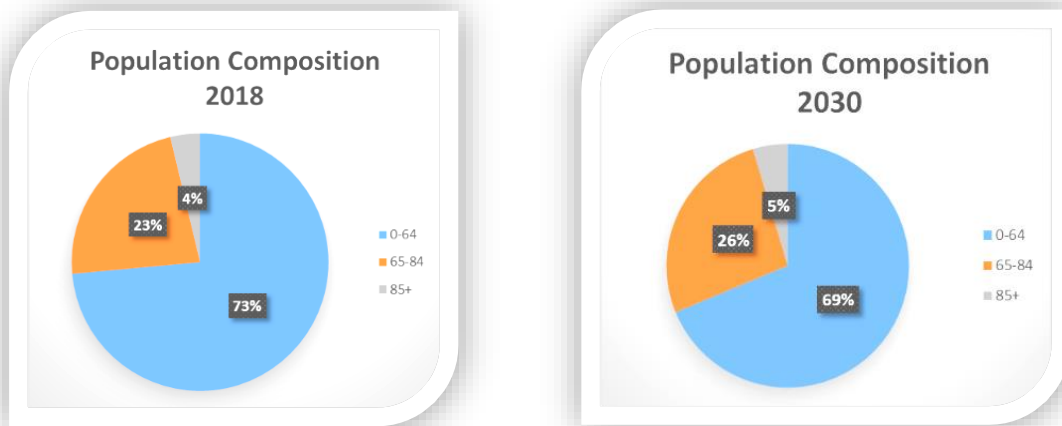


Figure 17: Torbay’s population composition in 2018 and 2030

The high proportion of elderly is matched by a smaller than average proportion of population in the working age group of 20-45 (figure 18). This may be attributed to poor career opportunities which encourage young qualified and older experienced workers to move elsewhere in search of better job prospects. The ONS publish Old Age Dependency Ratios (OADRs) which is the proportion of people above state retirement age to those of working age. Whilst this is high and rising in Devon and the South West, Torbay remains consistently higher with an estimated 580 people over retirement age per 10,000 adult population by 2040 (figure 19).

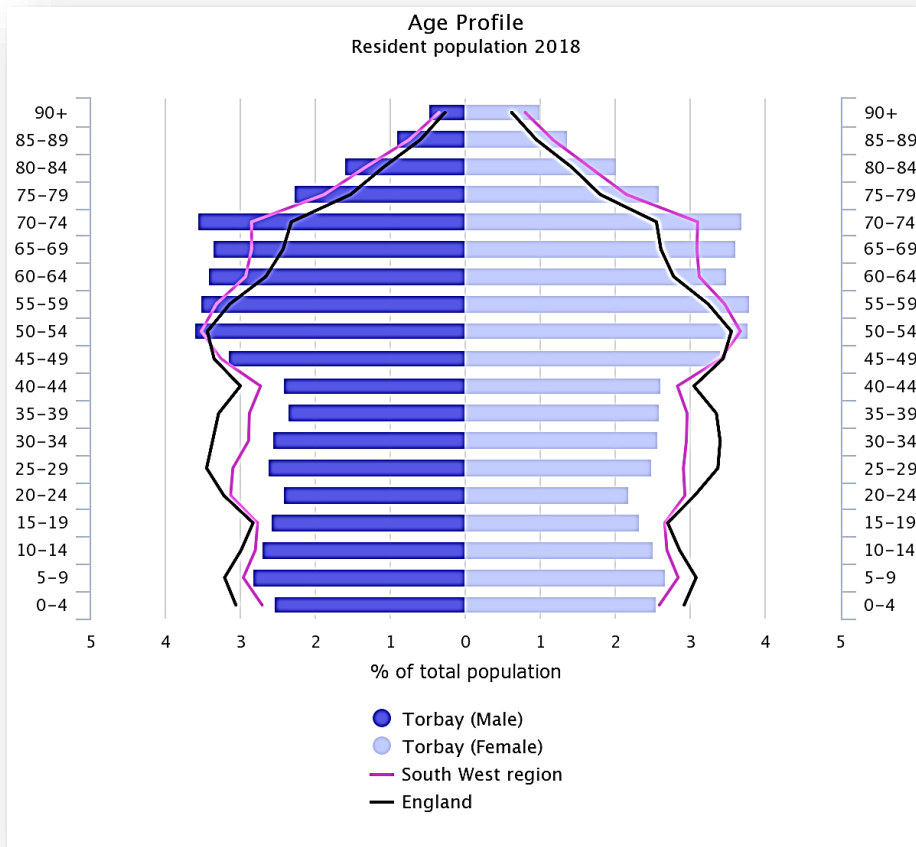


Figure 18: Torbay's age profile³⁰

³⁰ Local Authority Health Profiles 2019

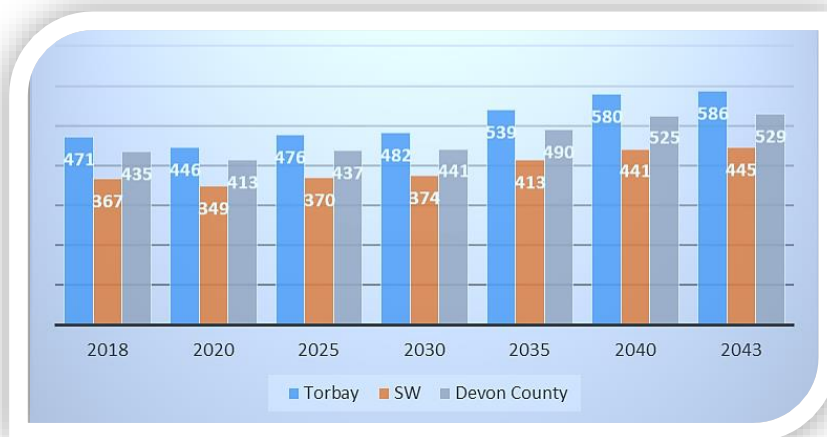


Figure 19: Old age dependency ratios³¹

Population projections suggest the number of births in Torbay will average around 1,400 per year. However, over the next 10 to 12 years, the number of children of school age is expected to increase. Most acutely in secondary school provision, with an estimated 1,000 more in the population aged 12 to 16 between 2017 and 2030³².

Future Trends: Torbay's total population is estimated to grow by around 5.0% between 2017 and 2027 (5.7% in England), whereas the over 75 population is expected to increase by around 36.5% (34.1% in England) over the same period. Over the longer term (2018-43) population is projected to increase by about 13%. As people get older, it becomes harder to remain independent because of increased risks of ill health, poverty and social isolation. Planning therefore has some influence for enabling good mental health and wellbeing through helping to create access to quality green space, facilitating opportunities for interaction through other community spaces and attractive living environments.

31 ONS 2019
32 JSNA 2018

5.2 Human health

Whilst it is not possible to change some of our individual determinants of health, such as age, sex at birth and genetic makeup, there are other factors that influence health and wellbeing such as living and working conditions, food supplies, access to essential goods and services, and the overall economic, cultural and environmental conditions prevalent in society as a whole.

Many forms of ill health are associated with deprivation as a result of insufficient health education, poor physical access and financial restraints. Accessibility to health services in Torbay is an issue in terms of physical access and local provision of services. This is especially problematic for the elderly and socially isolated and is exacerbated by the topography. This has resulted in accessibility to services being dependent on private cars and taxis.

Obesity is an increasing problem both nationally and locally with the prevalence of obesity among both children and adults having increased sharply in recent years. Latest data indicates about 60% of adults in Torbay were classified as overweight or obese. This trend can also be seen in children with around 9% of children in reception and 17.6% of children in year 6 having been identified as being obese between 2013 and 2018. Barriers to physical activities contribute to the obesity problem. These include cost of and distance to facilities, safety concerns, street lighting, quality of parks and open spaces, and presence or absence of cycle routes and footpaths.

Future trends: The high proportion of elderly population in Torbay places pressure on the local health care systems. There is likely to be an increased requirement for home adaptations or more specialised accommodation, such as specialist, sheltered or extra care housing and registered care provision, geared to allow as much independence as possible while supporting changing abilities. Recognised barriers to physical activities that are relevant to planning include cost of and distance to facilities, safety concerns, street lighting, quality of parks and open spaces, and presence or absence of cycle routes and footpaths. It is likely that a careful balance will need to be struck between providing specialist accommodation for the resident population and encouraging further migration by older people that could place further pressure on health services.

5.3 Social Inclusion

Social exclusion happens when people or places suffer from a series of problems such as unemployment, discrimination, poor skills, low incomes, poor housing, a high crime rate, ill health and family breakdown. When such problems combine they can create a vicious cycle. It can start from birth, being born into poverty or to parents with low skills still has a major influence on future life chances. The English Indices of Deprivation go some way to identifying hotspots of deprivation.

The English Indices of Deprivation 2019³⁴ ranks Torbay as the 48th most deprived local authority in England. While the 2019 Indices indicate a slight improvement compared to the 2015 Indices, Torbay remains the most deprived local authority in the South West region. Figure 20 shows that Torbay’s overall position has relatively worsened over time.

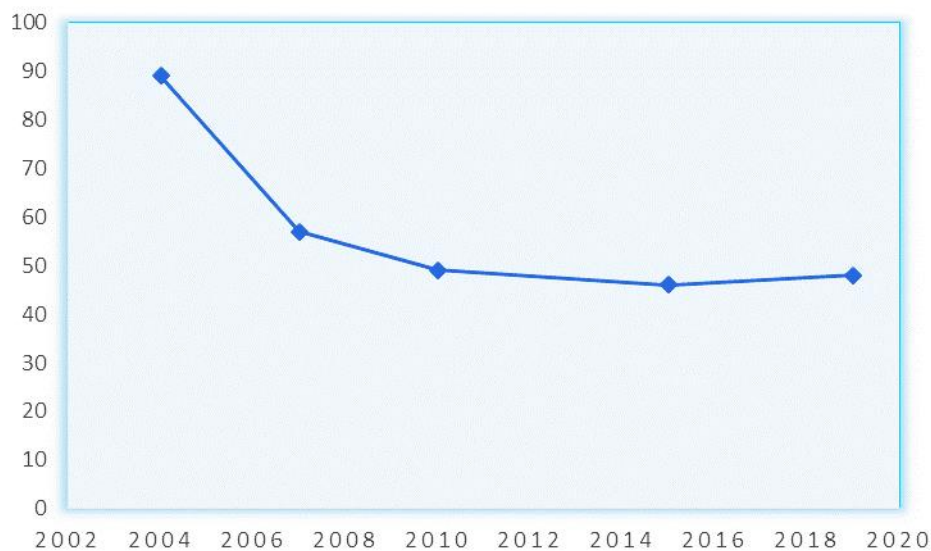


Figure 20: Deprivation Rank

Torbay performs particularly poorly in employment deprivation and has relatively high income deprivation together with low levels of household income, which reflects the high levels of economic inactivity and benefits claimants within Torbay. The high

³⁴ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

income deprivation has a negative effect on children, hence the number of children looked after by the local authority remains amongst the highest in England.

In 2019, 27% of Torbay’s population lived in the 20% most deprived areas in England in comparison to 32% in 2015. Some SOAs in Torbay face multiple issues of deprivation and are consistently ranked in the top 10% most deprived SOAs in England against a number of the different domains (figure 21). The most deprived SOAs are regularly located in the same wards, particularly in Tormohun, Ellacombe, and Roundham with Hyde.

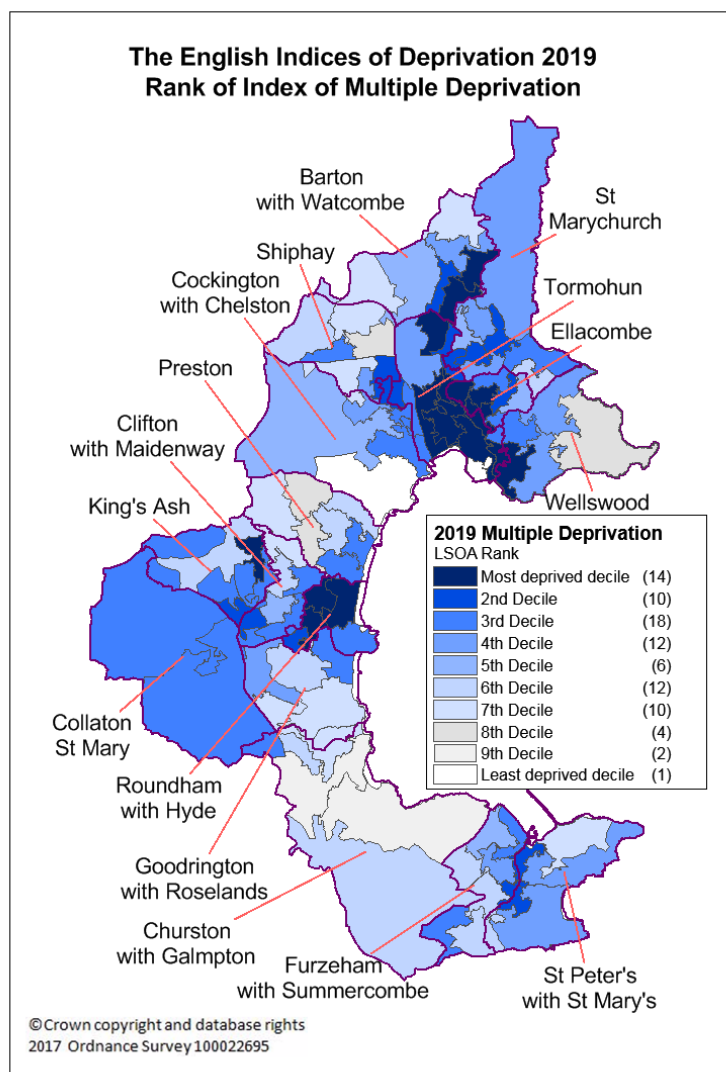


Figure 21: Indices of Multiple Deprivation 2019

Figure 22 below shows a comparison of the Indices of Multiple Deprivation (IMD) for 2015 and for 2019. The most significant fall (worsening) in rating relates to Barriers to Housing and Services and the most significant rise (improvement) in rating relates to Crime and Disorder.

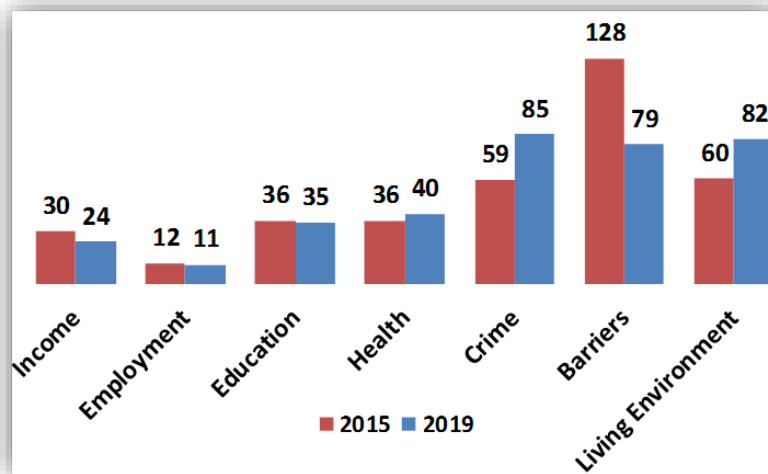


Figure 22: Torbay deprivation rank for 7 sub-domains that make up the IMD for Upper Tier (N.B. A lower number denotes higher deprivation).

Future trends: The main deprivation issues for Torbay are employment and income. Education and skills domain is fairly high as is income deprivation affecting children and older people domains. The correlation between deprivation and poor health and wellbeing is also an issue. Deprivation is mainly focussed on Torquay and Paignton Town Centres. Torbay has one of the highest rates of children looked after by the local authority in the country with issues of underlying neglect linked to poverty and drivers of need.

5.4 Barriers to Housing

Historically Torbay has had a low stock of social rented housing, although the gap with the national average has narrowed slightly in recent years. Torbay has a lower than national average owner occupation rate, a larger than average private rented sector and a very low level of intermediate home ownership. It is estimated that more than a quarter of households in Torbay live in privately rented homes, whereas only

around 8% of households live in social housing³⁵. In 2018-19 there were between 982 and 1074 households on the Housing Register waiting for affordable housing.

The overall levels of barriers to housing and services deprivation in Torbay have increased (i.e. deteriorated) between 2015 and 2019 with an average rank of 277 and 166 respectively and an increase from 2 to 8 SOAs in the top 20% most deprived in England. The wider barriers include household overcrowding, homelessness and housing affordability.

Torbay has a very pressing need for affordable housing, in common with much of the South West. Torbay house prices are around the national average (table 8) however, the low wage nature of the economy introduces severe affordability problems. In 2019, the average house prices were 7.99 times average earnings. Ratios of more than 3.5 indicate unaffordability and therefore a very significant gap between incomes and house prices remains. Affordability ratios have stayed in the 7 to 8 range in Torbay since the mid-nineties, denoting a long term problem with affordability which reflects the national picture.

Table 8: Housing affordability in England and Wales: 2000-2019³⁶

Affordability ratio (median house price/income)								
Area	2000	2005	2010	2015	2016	2017	2018	2019
England & Wales	4.13	6.74	6.84	7.37	7.59	7.77	7.85	7.7
South West	4.59	7.99	7.76	8.17	8.53	8.85	8.92	8.79
Torbay	4.62	8.9	8.34	7.86	8.17	7.71	8.8	7.99

The National Rough Sleeper Strategy 2018 identifies the need to address rough sleeping as a top government priority, with a target to halve rough sleeping by 2022 and eradicate it by 2027. Figure 23 below shows the official annual rough sleeper figures for Torbay from 2010 to 2019. The main reason for homelessness within

35 DRAFT Torbay Housing Strategy, 2020

36 ONS Ratio of house price to workplace based earnings

Torbay is the loss of rented accommodation. Rent levels have increased beyond the amount people are entitled to claim to help them pay their rent.

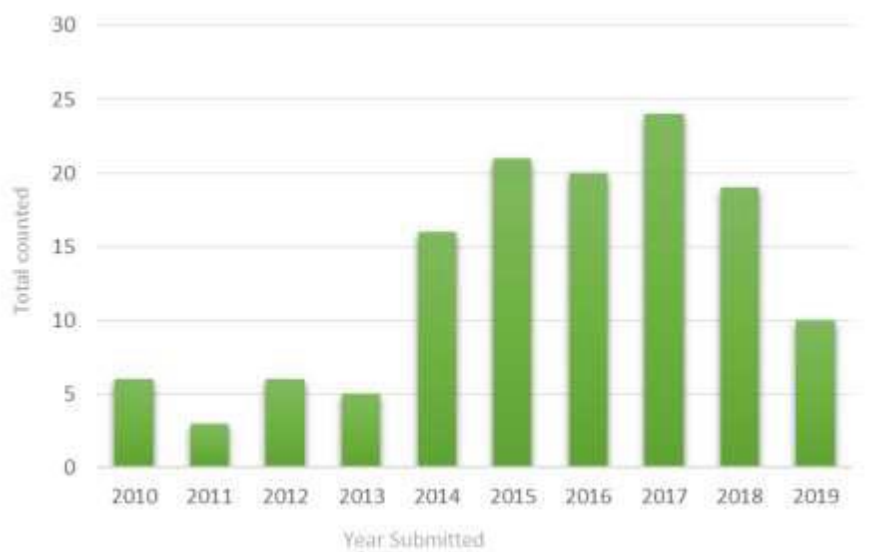


Figure 23: Annual rough sleeper figures from 2010 to 2019³⁷

Future trends: The need for affordable housing is likely to increase over the coming years. Sufficient and affordable housing in Torbay is likely to remain a major concern, resulting in young adults being unable to buy or rent accommodation locally. The quality of housing conditions is an area of concern with a higher percentage of private rented housing and significantly lower numbers of residents in social rented housing.

5.5 Crime and Disorder

The rate of crime within Torbay is 88 per 1000 resident population, slightly higher than the national average. Police recorded crime in Torbay rose by 22% in 2017/18 which follows on from a rise of 13% in the previous year³⁸. It has also increased at a higher rate than Devon and Cornwall as a whole between June 2016 and June 2018

37 Torbay Homelessness and Rough Sleeping Strategy 2020-2025 (Draft)
38 Draft Torbay Strategic Assessment 2018

(figure 24). The increase in recorded crime is largely due to improved crime recording and increased reporting as well as increased deprivation and police cuts.

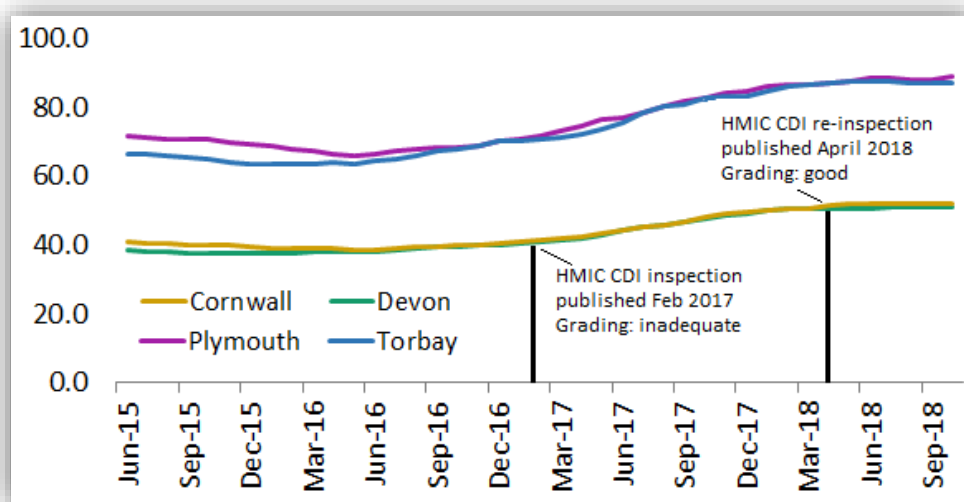


Figure 24: Crime rate per 1000 resident population 12 month rolling average³⁹

The Record of crime in Torbay in 2018 shows that of the total recorded crime, 39% were violent offences and 29% were theft offences (figure 25). The highest concentrations of crime and anti-social behaviour are in the central areas of Torquay and Paignton, which is to be expected given that these areas contain the highest concentrations of pubs, clubs and other nightlife. Torbay’s wards that are creating higher demands on services in terms of crime and community safety are Tormohun, Ellacombe and Watcombe in Torquay, and Blatchcombe and Roundham with Hyde in Paignton.

39. <https://devonandcornwall.s3.amazonaws.com/Documents/Planning%20and%20Performance/Torbay%20Crime%20Profile%202018%20Jun.pdf>

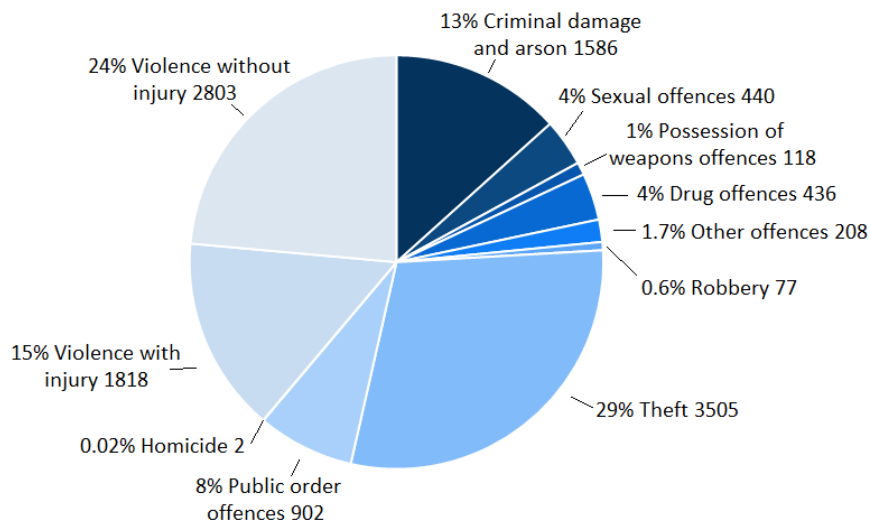


Figure 25: Percentage of total crime and volume by crime type³³

Future trends: The level of crime across Torbay is unequal but measurable. The key inequalities are within areas of deprivation which means that they experience challenges like greater unemployment or health problems when compared with other areas.

Appendix C: Consultation Statement

The consultation on the Sustainability Appraisal Draft Scoping Report took place over a five week period between 10 June and 17 July 2020. The Draft Scoping Report was made available to the three statutory consultees namely Natural England, Historic England and the Environment Agency. Responses were received from Historic England and Natural England in the form of a written response via email, with these responses having resulted in a number of amendments to the Draft Scoping Report. The Environment Agency have no comments to make and are satisfied with the draft Scoping Report as submitted.

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
Historic England		<p>As robust baseline information will also assist the Council in demonstrating an up-to-date and proportionate evidence base for the Local Plan Review itself, we advise you consider preparing a Heritage Topic Paper (HTP). This could help you draw together how you have considered and responded to our concerns in relation to the Draft Scoping Report and illustrate how you have approached the conservation and enhancement of the historic environment in the Local Plan Review. The HTP could set out:</p> <ul style="list-style-type: none"> ▪ existing evidence base and the need for any new evidence; ▪ how effective the adopted development plans have been; ▪ what the current historic environment issues are and how these will be addressed through the Local Plan Review; ▪ likely effects of the proposed changes in the Local Plan Review on Torbay's historic environment; 	<p>The Draft Torbay Heritage Strategy has addressed many of the issues that were recommended to be contained in the HTP. The Cultural Heritage section will be amended to address the remaining issues.</p>

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<ul style="list-style-type: none"> ▪ alternative options to avoid (wherever possible) significant adverse impacts on the historic environment and then solutions or measures for eliminating, reducing and finally mitigating any unavoidable impacts; and ▪ indicators with targets for monitoring the delivery of the Local Plan Review, including how these relate to existing indicators and monitoring of the adopted Local Plan for the conservation and enhancement of the historic environment. 	
	<p>3.1 Review of other relevant plans, policies and programmes (PPP)</p> <p>Appendix A: Review of Relevant Plans Policies and Programmes</p>	<p>Historic England has considered the information presented in section 3.1 of the Draft Scoping Report, including Table 1: List of Plans, Policies and programmes, as well as Appendix A: Review of Relevant Plans, Policies and Programmes. While the Draft Scoping Report identifies some of the more relevant plans, policies and programmes (etc.) relevant to the Torbay Local Plan Review, it should cover all relevant legislation, plans, policies and programmes and related advice at national and local levels. As such, there are some key additional items related to cultural heritage/historic environment that should be included as follows:</p> <ul style="list-style-type: none"> ▪ Historic Buildings and Ancient Monument Act 1953 ▪ Ancient Monuments & Archaeological Areas Act 1979 ▪ Town and Country Planning Act 1990 ▪ Planning (Listed Buildings and Conservation Areas Act) 1990 ▪ Planning and Compensation Acts 1991 and 2004 	<p>The Scoping report will include some of the key policies added in the comments, however some of the PPPs are part of the LPR evidence base and therefore will not be included in the list of other relevant PPPs.</p>

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<ul style="list-style-type: none"> ▪ Planning Act 2008 ▪ Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) ▪ Marine and Coastal Access Act 2009 ▪ Enterprise and Regulatory Reform Act (2013) ▪ Planning Practice Guidance for the historic environment (https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment) ▪ Historic England advice, notably: ▪ The Historic Environment in Local Plans Historic Environment Good Practice Advice in Planning: Note 1 (2015) ▪ The Historic Environment and Site Allocations in Local Plans (2015) ▪ Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) ▪ Sustainability Appraisal and Strategic Environmental Assessment (2016) ▪ Joint Heritage Sector Statement on Climate Change (2020) and associated research and advice on adaptation and mitigation ▪ Historic Town Centres and High Streets including Streets for All (2018) and the South West version ▪ ‘adopted’ Neighbourhood Plans for Brixham, Paignton and Torquay (2019) ▪ Brixham Urban Fringe Landscape Study (2011) 	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<ul style="list-style-type: none"> ▪ Torbay Landscape Character Assessment Part 1 and Part 2 (2010) ▪ Seascape assessment for the South Marine Plan Areas: technical report June 2014 ▪ Conservation Area Character Appraisals and/or related documents ▪ Torquay and Paignton Town Centre Masterplans (2015), Torquay Gateway (Edginwell) Masterplan (2016) and Collaton St Mary Masterplan (2016) ▪ Historic England’s Heritage at Risk South West Register 2019 (noting that this will next be updated in Autumn (2020)) ▪ Devon Historic Environment Record. 	
	4.1 Baseline information Appendix B: Baseline information – section 3 cultural heritage (pages 39-41)	Historic England has considered the baseline information on cultural heritage presented in section 4.1 of the Draft Scoping Report and in section 3 of Appendix B. While we welcome the inclusion of baseline data on cultural heritage, we note that the Draft Scoping Report provides an overview of some designated heritage assets in Torbay with undated information sourced from Heritage Gateway. The National Heritage List for England (NHLE) is the only up-to-date information source for designated heritage assets excluding conservation areas. At the time of preparing these comments, the NHLE indicates that there are: 6 x Grade I Listed Buildings; 30 x Grade II* Listed Buildings; 839 x Grade II Listed	The cultural heritage section will be amended as requested.

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>Buildings; 13 x Scheduled Monuments, 1 x Grade I Registered Park and Garden; 1 x Grade II* Registered Park and Garden; and 5 x Grade II Registered Parks and Gardens in Torbay. This differs from the information in the Draft Scoping Report and we suggest that you download and use the latest NHLE datasets from our website, ensuring that attention is paid to all types and grades of heritage asset. We are aware of two gaps in the baseline data in relation to the historic environment:</p> <ul style="list-style-type: none"> ▪ Heritage at risk: the information presented provides no indication of the current condition of Torbay’s heritage assets, in particular those at risk through neglect, decay or other threats. Historic England maintains a Heritage at Risk Register (updated every Autumn) and there are 10 assets ‘at risk’ in Torbay in the 2019 version of the Register. Our Register excludes grade II listed buildings that are not places of worship, so there may be other designated heritage assets that are known to be at risk in Torbay. Your local authority conservation and archaeological advisers should be able to advise you of these. ▪ Non-designated heritage assets: with no local heritage list or register, information sources for non-designated heritage assets may include the Devon Historic Environment Record, Conservation Area Character Appraisals, Neighbourhood Plans, as well as the emerging new Torbay Heritage Strategy. 	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>Advice should be sought from your local authority conservation and archaeological advisers on non-designated heritage assets in Torbay and their current condition. The likely future trends part of the baseline information would benefit from some additional work in our view. While it identifies development as a powerful force for change in relation to the conservation and enhancement of the historic environment and recognises the need to understand and (hopefully to respond to) the historic environment and sense of place when following issues:</p> <ul style="list-style-type: none"> ▪ how the existing historic environment policies in the adopted Local Plan have performed, which will be key to understanding the likely future condition of historic environment without the proposed changes to the Local Plan in the Review; ▪ The National Planning Policy Framework (NPPF) (2019) and its direction in chapter 16 that: <ul style="list-style-type: none"> ▪ heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance (paragraph 184); ▪ great weight should be given to their conservation when considering the impact of development proposals irrespective of the level of harm (paragraph 193); ▪ local authorities should seek to avoid or minimise conflict between the conservation of heritage assets and development proposals (paragraph 190); 	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<ul style="list-style-type: none"> ▪ Whether there are any particular locations or specific heritage assets that have significance, sensitivity and/or capacity to accommodate change or development that may be affected by the proposed changes in the Local Plan Review; and ▪ How any issues you are intending to address/policies you are intending to change or add in the Local Plan Review affect the historic environment, given its inter-relationship with many other policy topics. Obvious examples include climate change, flood risk, coastal erosion, housing and infrastructure but also tourism and the challenges facing Torbay’s historic town centres and high streets, which have been heightened by COVID-19. 	
	<p>4.1 Baseline information Appendix B: Baseline information – section 4 landscape (pages 42-44)</p>	<p>Given the inter-relationships between the historic environment and landscape, Historic England has also considered section 4 in Appendix B. We welcome the inclusion of baseline data on landscape and are pleased to see that this covers urban townscape, rural landscape, as well as seascape, which all positively contribute to local character and distinctiveness.</p> <p>Townscape, landscapes and seascapes can form the settings of, and hence contribute to, the significance of heritage assets as well as being heritage assets in their own right, e.g. conservation areas, registered parks and gardens. It would be appropriate for the text to recognise this.</p>	<p>Noted</p>

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>In terms of the current condition of townscape and landscape, it would also be worth noting that of the 10 assets currently on our Heritage At Risk Register for Torbay, three are registered parks and gardens and one is a conservation area.</p> <p>In the same way as you have done for landscape character and Figure 11, you could also recognise that marine character areas have been identified in Seascape assessment for the South Marine Plan Areas: technical report (June 2014). This would be appropriate given Torbay's coastal location.</p> <p>In terms of future trends, the text gives a fuller picture of some of the challenges of conserving and enhancing landscape character but this does not provide an indication of how existing policies are performing. The section should also cover seascape and area-based heritage assets.</p>	
	4.2 Existing Sustainability Issues and Problems	<p>Historic England has considered the sustainability issues and problems described in Table 2 in section 4.2 of the Draft Scoping Report. We welcome the inclusion of the following sustainability issues but offer the following comments:</p> <ul style="list-style-type: none"> ▪ The need for resilience: this should recognise the opportunities offered by Torbay's historic environment as well as the potential impacts on it in relation to the recovery of Torbay's historic town centres and high streets from COVID-19 (and the challenges 	Noted

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>they were already facing from seasonal demand from tourism and changing shopping habits) as well as from climate change adaptation and mitigation. Further information and advice on Historic Town Centres and High Streets can be found on our website. See below for further information and advice on climate change.</p> <ul style="list-style-type: none"> ▪ The potential for climate change cumulative effects on ecosystem services (global, national and local): we consider that this issue should be broadened to include the effects of climate change on the historic environment. Following the declaration of a climate emergency by the Government in May 2019, we consider that climate change is one of the most significant and fastest growing threats to people and their cultural heritage. We recognise that the historic environment sector must contribute to reducing greenhouse gas emissions, so as to minimise the most harmful impacts of climate change. Given the scale of the challenges, Historic England has committed to collaborating to understand and address the impacts of climate change on the historic environment as a signatory to the Joint Heritage Sector Statement on Climate Change in June 2020. Historic England recognises the importance of climate change mitigation and adaptation as part of building resilience for the historic environment and believes that energy efficiency, sustainable technology and reducing 	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>carbon emissions are compatible with the conservation of our heritage. Research by Historic England has found that reusing, refurbishing and retrofitting existing buildings should be a priority for meeting the Government's net zero carbon target by 2050, taking into account their embodied carbon and that we can reduce the carbon emissions of historic buildings by over 60% by 2050 if we take a whole of life carbon approach. We offer advice on many related topics including the installation of renewable energy generation and also on energy efficiency and historic buildings, to help advise on how this can be undertaken as part of an effective climate change strategy while minimising negative impacts on the historic environment.</p> <ul style="list-style-type: none"> ▪ Impact on nationally important landscapes: this sustainability issue should be broadened to include all types of landscape, townscape and seascape. It should identify if there are particular areas of landscape, townscape and/or seascape in Torbay that are on Historic England's Heritage at Risk Register (see comments in response to consultation question 3). It should also consider if there are areas whose character or quality, or people's enjoyment of them, are under threat from loss, erosion and/or development either directly or indirectly. ▪ Declining historic heritage: the wording of this sustainability issue should be changed to refer to conserving, enhancing and enjoying the historic environment or heritage assets to better 	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>reflect the terminology of the NPPF as per paragraphs 184 and 185. The issues to be addressed should be broadened beyond the potential negative impacts of new development on the significance of heritage assets, including their settings, and recognise that Torbay’s historic environment offers opportunities for positive outcomes for people and cultural heritage. Examples may include:</p> <ul style="list-style-type: none"> ▪ heritage-led regeneration of specific sites or high streets or town centres; ▪ stronger sense of place and local distinctiveness by informing design; ▪ addressing heritage at risk or otherwise under threat (see comments for consultation response 3); ▪ heritage-based tourism; ▪ improving understanding and awareness of the historic environment (e.g. interpretation); and ▪ identification and conservation of non-designated heritage assets. <p>Given that the Local Plan Review intends to focus on climate change, this issue should also consider how the historic environment can positively contribute to climate change resilience (see comments above).</p>	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
	4.3 Sustainability Appraisal Framework - objectives	<p>Historic England has considered the proposed Sustainability Appraisal Framework set out in section 4.3 of the Draft Scoping Report comprising the sustainability objectives and indicators. In response to the proposed objectives, we support the inclusion of sustainability objective 1 (climate change).</p> <p>While we also strongly welcome sustainability objective 5 (historic environment/cultural heritage), we consider this should be reworded as follows:</p> <p>To conserve, enhance and enjoy the historic environment.</p> <p>We also strongly support the inclusion of sustainability objective 6 (landscape/townscape). However, we consider this should be broadened to include seascape, given Torbay's coastal location.</p> <p>The NPPF emphasises the importance of maintaining and responding to local character and distinctiveness and achieving high-quality buildings and places (even more so with the publication of the National Design Guide). Given this, we consider that this objective should be broadened to cover this (with appropriate indicators), especially if you are anticipating an increase in the amount and/or scale of new development as a result of the Local Plan Review (housing numbers, densities, etc.).</p> <p>Given the scale of the challenges currently facing our historic town centres and high streets, we question if there should be an</p>	<p>Change the wording of objective 5 and 6 the as requested.</p> <p>Maintain the local character and distinctiveness and achieving high quality building and places is required by the NPPF and will be covered by the LPR policies and will be measured by indicators in the AMR.</p>

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		additional sustainability objective related to this with appropriate indicators, e.g. footfall, vacant unit numbers, etc.	
	4.3 Sustainability Appraisal Framework - indicators	<p>Historic England has considered the proposed indicators in relation to sustainability objectives 5 (historic environment/cultural heritage) and 6 (landscape/townscape). While we welcome the inclusion of indicators related to heritage at risk, we consider this should be presented as one indicator with a target. Historic England's Heritage at Risk Register is updated annually. By having separate indicators for different listing types (but not all the listing types covered by our Register), there is the possibility that a new heritage asset at risk may be added to our Register that would not be captured using the proposed indicators.</p> <p>Our Heritage at Risk Register also only covers certain categories of listed building – grade I & II* listed buildings and grade II places of worship. As such, there may be other 'at risk' designated heritage heritages not covered by our Register in Torbay as well as examples of non-designated heritage assets and wider landscapes, streetscapes, townscapes and seascapes (see sustainability objective 6). Indicators with targets should be found to monitor these.</p> <p>Other indicators with targets should be included that will give a more rounded perspective on the likely significant effects of the</p>	<p>Noted, the Sustainability Appraisal Framework- indicators will be amended as requested.</p> <p>Add the list of indicators provided in the recommended Heritage Topic Paper.</p>

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>Local Plan Review on the historic environment. It is difficult to comment further at this point without a better understanding of the scope of the Local Plan Review, the nature of the intended changes to existing policies and how any proposed indicators relate to existing indicators and monitoring of the adopted Local Plan for the conservation and enhancement of the historic environment. Examples could, however, include:</p> <ul style="list-style-type: none"> ▪ number of heritage assets that have been successfully reused refurbished and/or retrofitted; ▪ number of grants offered; ▪ number of locally identified non-designated heritage assets (particularly relevant if you are intending to create a Local List/Register of Local Assets); ▪ number of locally identified heritage assets at risk; ▪ number of up-to-date conservation area character appraisals and management plans; ▪ number of enhancement projects identified in conservation area management plans, neighbourhood plans and/or masterplans that have been actioned; ▪ number of heritage assets known to have been lost or substantially harmed through consented and unauthorised development; ▪ number of new records added to the Devon Historic Environment Record for Torbay. 	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		Options for indicators could be considered in a Heritage Topic Paper as part of preparing the evidence base for the Local Plan Review.	
	4.3.1 Compatibility of sustainability objectives	<p>Historic England has considered the compatibility of sustainability objectives as set out in section 4.3.1 and the matrix in Figure 2. In relation to sustainability objective 5 (historic environment/cultural heritage), the matrix indicates that there is no link between this objective and sustainability objectives 1-4, 7 and 9-12. This should be reassessed. The conservation, enhancement and enjoyment of the historic environment overlaps with almost all the other sustainability objectives, for example:</p> <ul style="list-style-type: none"> ▪ the historic environment can make a positive contribution to climate change adaptation and mitigation, e.g. reuse and retrofit historic buildings, under sustainability objective 1; ▪ improvements to air and water quality, and reductions in noise levels and car travel under sustainability objectives 2 and 7 may enhance the significance of heritage assets and/or their settings or character and quality of people’s enjoyment of townscapes, landscapes and seascapes ; ▪ the provision of green infrastructure under sustainability objective 4 can be used to preserve heritage assets in situ, e.g. archaeological sites, while additional planting can enhance the 	Noted, Compatibility of sustainability objectives section will be amended as requested.

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>settings of heritage assets and/or landscape character if it is carefully sited and designed;</p> <ul style="list-style-type: none"> ▪ using previously developed land/buildings under sustainability objective 9 may offer opportunities to address heritage at risk, bring redundant or underutilised historic buildings back into active use, and help to revitalise historic town centres and high streets; and ▪ new housing intended under sustainability objective 12 may be successfully provided in heritage assets. <p>We agree that sustainability objectives 5 and 6 are compatible (see comments above) as are sustainability objectives 5 and 13. Further information about the role of the historic environment in promoting health and wellbeing can be found on our website.</p> <p>Sustainability objective 5 may be compatible with sustainable objective 8 as economic growth may enable heritage assets that are at risk or vacant or underutilised to find compatible and viable new uses. However, as with most of the sustainability objectives in relation to the historic environment/cultural heritage, there is the potential for negative as well as positive effects. For this reason, you may wish to consider introducing a fourth option in Figure 2: Compatibility test to cover relationships between sustainability</p>	

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>objectives that are either uncertain or where there a mix of positive/negative effects is anticipated.</p> <p>For the same reasons as outlined above, you should also reconsider the compatibility of sustainability objective 6 with the other objectives. For example, we note that sustainability objective 6 has been assessed as potentially in conflict with sustainability objective 12. If it is sensitively located, well-designed and draws upon the historic environment (where appropriate), however, residential development can make positive contributions to the character, quality and distinctiveness of Torbay’s landscape, townscape and seascape character.</p>	
Natural England	Question 1	<p>Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;</p> <ul style="list-style-type: none"> ▪ Green infrastructure strategies ▪ Biodiversity plans ▪ Rights of Way Improvement Plans ▪ Shoreline management plans ▪ Coastal access plans ▪ Marine Plans (including emerging Plans) ▪ River basin management plans 	The review has covered the relevant plans and strategies in the list.

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<ul style="list-style-type: none"> ▪ AONB and National Park management plans. ▪ Relevant landscape plans and strategies. 	
	Question 2	<p>The sources of evidence listed at Annexe A may be useful in ensuring local plans are evidence based, in line with paragraph 31 of the National Planning Policy Framework (NPPF) and assist in meeting Strategic Environmental Assessment (SEA) requirements. A range of additional locally specific evidence is also likely to be needed to underpin plan preparation.</p>	<p>Most of the locally specific evidence is part of the Local Plan Review evidence base and therefore has not been listed in the other relevant plans, policies and programmes list.</p>
	Question 4	<p>We note that the list does not make specific reference to protecting and enhancing soils, as referred to in paragraph 170a of the NPPF. The Plan area is not heavily constrained by the presence of Best and Most Versatile agricultural land, however, there are some areas of undeveloped BMV land within the Plan area and the wider benefits of that land should be recognised (NPPF paragraph 170b). It should also be noted that climate change is likely to have an adverse effect on the health of soils, which are a key natural capital asset. The conservation of healthy soils is key to the provision of food to support healthy lifestyles, in addition to the role they play in carbon storage, supporting biodiversity, water regulation and fuel provision.</p>	<p>Make reference to protecting and enhancing soils in the Sustainability Issues and Problems section. Expand green infrastructure to include improving people's access to nature as requested.</p>

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>We acknowledge and support the aims to provide green infrastructure and promote access to open space but note that there is no specific reference to improving people’s access to nature. This should be included as a key issue.</p>	
	Question 5	<p>The proposed Sustainability Framework reflects the key sustainability topics but would be more effective at appraising the sustainability of the policy options if each objective contained decision-aiding sub-objectives / questions that prompt more detailed consideration of how effective the policy options are likely to be. The objectives should aim to address the key issues identified in Table 2 of the Draft SA Scoping Report. Some examples of sub-objectives are provided below:</p> <p>Health and Green infrastructure: The Health objective could include a sub-objective relating to whether the option avoids impacts on, and enhances, the quality and extent of recreational resources and accessible natural greenspaces.</p> <p>Soils and agricultural land: There is an objective relating to improving soil quality but the inclusion of a sub-objective is recommended, with the aim of avoiding the loss of best and most versatile agricultural land.</p> <p>Biodiversity: This objective could include a sub-objective that seeks to ensure that existing ecological networks are not compromised,</p>	<p>Disagree. The Local Plan Sustainability Appraisal 2015 contains broad sustainability objectives which required sub-objectives to provide more details. The proposed sustainability objectives are more specific and the accompanying indicators would provide the level of details necessary to aid the decision making. Options and policy appraisal will be accompanied with a commentary column.</p>

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<p>and that future improvements in habitat connectivity are not prejudiced.</p> <p>Landscape: This objective could include separate sub-objectives relating to conserving and enhancing landscape character; respecting the qualities of the designated AONB and its setting; and making a positive contribution to townscape character. A policy option may perform well in one aspect but not all three, for example.</p>	
	Question 6	<p>The suggested indicators largely relate to factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate:</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> ▪ Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. ▪ Percentage of major developments generating overall biodiversity enhancement. 	Noted, replace generic indicators with bespoke indicators where possible.

From	Section/ page/ paragraph	Comment	Torbay Council proposed actions and additional notes
		<ul style="list-style-type: none"> ▪ Hectares of biodiversity habitat delivered through strategic site allocations. <p>Landscape:</p> <ul style="list-style-type: none"> ▪ Amount of new development in AONB/Heritage Coast with commentary on likely impact. <p>Green infrastructure:</p> <ul style="list-style-type: none"> ▪ Percentage of the Plan area's population having access to a natural greenspace within 400 metres of their home. ▪ Length of greenways constructed. ▪ Hectares of accessible open space per 1000 population. 	