

Teignbridge Local Plan 2013 – 2033: Strategic Environmental Assessment Adoption Statement



Statement under Regulation 16(4) of The
Environmental Assessment of Plans and
Programmes Regulations 2004

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1 Introduction

- 1.1. The Teignbridge Local Plan was submitted to the Secretary of State on 20 June 2013 and was subject to examination between 5 and 24 September 2013. A consultation was held on the Inspector's recommended 'Main Modifications', which ran between 19 December 2013 and 7 February 2014. The Local Plan was adopted by Full Council on 6 May 2014.
- 1.2. As soon as reasonably practicable following adoption of the Local Plan the Council is required to produce a statement containing the particulars set out in Regulation 16(4) of The Environmental Assessment of Plans and Programmes Regulations 2004, which are summarised below and correspond with sections 3 – 8 of this report.
 - How environmental considerations have been integrated into the plan;
 - How the environmental report has been taken into account;
 - How opinions expressed in responses to consultations have been taken into account;
 - How the results of any consultation with other member states have been taken into account;
 - The reasons for choosing the plan as adopted, in light of other reasonable alternatives dealt with; and
 - The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.

2 Background

Legislation

- 2.1. Directive 2001/42/EC of the European Parliament requires the production of an environmental report where there is the potential for a significant effect on the environment as a result of the implementation of a plan or programme.
- 2.2. The objective of the Directive is 'to provide for a high level of protection of the environment and integrate environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.' Although not referred to as such within the Directive, the environmental reports are commonly referred to as Strategic Environmental Assessments, or SEA.
- 2.3. The requirements of the Directive in terms of plan making in England are set out in The Environmental Assessment of Plans and Programmes Regulations 2004. After the plan's adoption, the regulations set out a requirement to prepare a statement containing information such as how environmental considerations have been integrated into the local plan.
- 2.4. The Planning and Compulsory Purchase Act 2004 made Sustainability Appraisals (SA) mandatory for new or revised development plan documents, such as the Local Plan. The SA process is not so clearly defined in regulation, but it is best practice to combine the SA and SEA process and that is what has been done in relation to the Teignbridge Local Plan. Effectively, this extends the area of interest into a wider range of sustainability issues, including social and economic areas.

Government Policy

- 2.5. The National Planning Policy Framework (NPPF) set out the Government's planning policies for England, with the presumption in favour of sustainable development the "golden thread". The NPPF considers three dimensions of sustainable development, being economic, social and environmental. Local Plans are required to reflect this presumption in favour of sustainable development, unless material considerations indicate otherwise.
- 2.6. There is also a requirement to assess and then, as far as possible, to meet objectively assessed housing and employment needs so a judgment is required in considering how to plan most appropriately for the growth of an area in considering the whole range of social, economic and environmental issues. This judgement is supported by the SA/SEA work undertaken for the plan.

Teignbridge Local Plan 2013-2033

- 2.7. The Teignbridge Local Plan 2013-2033 is a plan produced under the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning)(England) Regulations 2012 to form part of the development plan for the area. It was adopted by the Council on May 6th 2014 incorporating main and

minor modifications after receiving the necessary Inspector's report containing his recommendations.

Teignbridge Local Plan Environment Statement

- 2.8. The content and use of the environmental statement is set out in subsequent chapters. For clarity, the Teignbridge Local Plan environmental statement includes:
- Sustainability Appraisal / Strategic Environmental Assessment (October 2012), "The October 2012 Report".
 - Addendum to the Sustainability Appraisal (June 2013) "The June 2013 Report".
 - Further Addendum Sustainability Appraisal (December 2013) "The December 2013 Report".
 - Errata for Further Addendum Sustainability Appraisal (May 2014) (see section 5 of this report).

3 How environmental considerations have been integrated into the plan

Introduction

- 3.1. The Local Plan was informed by a significant amount of environmental baseline information. This information was initially reported within the Scoping Report.
- 3.2. The Scoping Report reviewed Plans, Programmes and Strategies of relevance to the preparation of a development plan at all levels, including at the International, National, Regional and Local level. The report also included an appraisal of quantitative and qualitative data relating to the Teignbridge plan area (which excludes the part of Dartmoor National Park within Teignbridge district).
- 3.3. The October 2012 report pages 20 – 30 provides an overall description of the area's economic, social and environmental baseline. This was supplemented in the June 2013 report on pages 12 – 24 and 33 - 38 by maps and descriptions indicating key environmental and other constraints in context with preferred options and proposed submission development proposals. In summary, the key aspects set out include:

Environmental baseline:

- 28 Sites of Special Scientific Interest (SSSI) within the Plan area covering 3,582 hectare and 11 SSSIs within Teignbridge that lie in the Dartmoor National Park plan area
- 3 European Protected Sites: Special Areas of Conservation (SAC) at Dawlish Warren and the South Hams SAC for greater horseshoe bats at Chudleigh and Buckfastleigh; Special Protection Area at the Exe Estuary, Exminster Marshes and Dawlish Warren
- Coastal environment
- Strategic nature areas at Bovey basin, Ashcombe, Haldon Hill, Teign Valley and Denbury Down
- Four air quality management areas
- High levels of waste recycling (55%)
- Strong landscape characteristics
- 2,200 listed buildings and structures
- 29 conservation areas
- 28 Scheduled Ancient Monuments
- Renewable energy capacity of 7.4 megawatts
- 665 hectares of publicly accessible open space

Social baseline:

- A quarter of the population over 65 years of age
- 1% of the population from black and minority ethnic groups
- Net in-migration of predominantly over 45s and out-migration of younger people
- Life expectancy higher than national average
- Significant proportion of households on low incomes
- Low crime levels but high fear of crime
- Low stock of social housing (10%) and low house building rate
- 40% of houses owned outright (no mortgage), higher than national average
- Low levels of public transport use, high level of car ownership

Economic baseline:

- District-wide lack of high quality jobs
- Average earnings for those working in Teignbridge lower than regional and national averages
- High levels of out commuting
- Retail, manufacturing and public services are the top employment sectors of employment for residents
- Despite location tourism is not a significant contributor to economy
- Productivity below national average, but an enterprising economy with businesses employing less than 50 people accounting for 97% of the economy
- Low vacancy rates in town centre shops
- Internationally important ball clay deposits west of Newton Abbot

Assessment Objectives

- 3.4. It is not usually appropriate in SEA, and is often impracticable, to predict the effects of an individual project-level proposal in the degree of detail that would normally be required for an Environmental Impact Assessment of a project (a similar, but separate legal requirement for project – level proposals such as planning applications). If, however, a plan or programme proposes a specific development or type of land use for a particular area or location, the Environmental Report should include information which can reasonably be provided on the likely significant effects of that proposal and alternatives to it.
- 3.5. The June 2013 Report provided further information on the environmental baseline, including constraint mapping of the main settlements, to indicate the key environmental and other sustainability influences on the level and distribution of development. This had been previously available in a number of locations, but the June 2013 Report brought it together in one document to help elucidate the decision-making processes.

3.6. The sustainability objectives were assessed to ensure that they offered full coverage of the 'environmental' factors set out in the European Directive for which any 'likely significant effects' should be considered. The objectives used in the appraisals are set out in the table below.

Sustainability Objective	Factors
<p>A Natural Environment</p> <p><i>To protect, conserve and enhance the area's natural environment</i></p>	<p>Natural habitats and biodiversity; flora and fauna</p> <p>Wildlife and Species</p> <p>Natural Landscape character</p> <p>Coastal development</p>
<p>B Built Environment</p> <p><i>To preserve and improve the areas built environment and heritage assets</i></p>	<p>Design and build quality of new development</p> <p>Cultural heritage</p> <p>Archaeology – SAMs</p> <p>Conservation areas and design</p> <p>Townscape/regeneration</p> <p>Gateways and public art</p>
<p>C Climate Change</p> <p><i>To mitigate and adapt to possible effects of climate change</i></p>	<p>Provision of open space in urban environments</p> <p>Reducing the need to travel (carbon savings)</p> <p>Reduce flood risk and the threat to people and property</p> <p>Cycle and walking provision to support reductions in car travel.</p> <p>Promote the usage of renewable sources of energy and support energy efficiency.</p>
<p>D Resource Use</p> <p><i>To minimise the loss or degradation of finite natural resources.</i></p>	<p>Soils quality and supply</p> <p>Water quality and its future supply</p> <p>Minimise waste (reuse, recycle, recover)</p> <p>Loss of quality agricultural land</p> <p>Sterilisation of mineral resources</p>
<p>E Jobs and Local Economy</p> <p><i>To foster an entrepreneurial economy with improved productivity, providing a strong employment offer.</i></p>	<p>Economic generating uses (including housing and population growth)</p> <p>Productivity – access to labour supply</p> <p>Employment offer – more business space</p> <p>Tourism / commercial cultural and leisure provision</p> <p>Skills training</p>
<p>F Town Centres</p> <p><i>To strengthen and safeguard the vitality and viability of our town</i></p>	<p>Strengthen and safeguard the vitality and viability of town centres</p> <p>Relationship between new development and</p>

<i>centres</i>	town centres
<p>G Housing</p> <p><i>To provide and maintain a sufficient supply of good quality, mixed housing, including an appropriate level of affordable housing</i></p>	<p>Supply of housing</p> <p>Housing mix</p> <p>Efficiency of housing</p> <p>Access to services</p> <p>Balanced places providing access to an appropriate mix of services and facilities.</p> <p>Housing affordability</p>
<p>H Health & Wellbeing</p> <p><i>To support healthy lifestyles and a healthy local living environment</i></p>	<p>Safe and secure environment with a reduced fear of crime</p> <p>Access to open space and recreation</p> <p>Limit air, noise and light pollution to levels that do not damage human health or natural systems</p> <p>Active forms of transport ensuring integration of public transport, walking and cycling opportunities</p> <p>Air Quality</p> <p>Fear of crime.</p> <p>Public recreational and leisure opportunities</p> <p>Social Deprivation</p>
<p>I Infrastructure</p> <p><i>To ensure sustainably balanced places are created or maintained providing access to an appropriate mix of services and facilities.</i></p>	<p>Green infrastructure</p> <p>Roads and transport</p> <p>Area-wide services (schools, health care, etc)</p> <p>Community centres</p>

3.7. These incorporate all of the environmental issues set out in the SEA regulations, Schedule 2, as follows:

- Biodiversity (Objective A)
- Population (Objectives B, E, F, G, H)
- Human Health (Objective H)
- Fauna (Objective A)
- Flora (Objective A)
- Soil (Objective D)
- Water (Objective D)
- Air (Objective D)
- Climatic Factors (Objective C)

- Material Assets (Objectives B, D, E, F, G, I)
- Cultural Heritage including Architectural and Archaeological Heritage (Objective B)
- Landscape (Objective A)

Key Sustainability Issues

- 3.8. Arising from this information a number of key sustainability problems and issues can be picked out, which are priorities for the Local Plan to address. These were chosen based on the review of previous local planning policies, the work on the former draft regional spatial strategy, the council's corporate objectives and the community plan, as well as an analysis of the sustainability trends considered above. Comments on the Local Plan received during the prepublication consultations were also assessed to see if new key issues emerged.
- 3.9. These key strategic problems, objectives and issues for sustainable development identified for Teignbridge are set out below. They continue to reflect those which informed the preparation of the Local Plan, and are closely reflected in the local plan policies, proposals and strategy.
- Measures to mitigate and adapt to Climate change, particularly flooding.
 - The level of services and employment in smaller communities.
 - Low use of public transport, walking and cycling and increasing car use.
 - Impact on existing biodiversity, particularly protected European sites and possible future reductions.
 - The need to reduce out-commuting and providing significantly greater local job opportunities.
 - The need for infrastructure meeting the needs of providers and communities.
 - Town centres and their enhancement.
 - Supporting more sustainable transport modes and other measures to reduce carbon emissions
 - Meeting the need for housing including significant affordable housing requirements.
 - Protecting and enhancing biodiversity and heritage assets including international wildlife sites.
 - Improvements to air quality
 - Involvement of local communities in decision making
 - Helping to reduce deprivation, including housing, employment, income and other forms of deprivation, particularly in the areas of multiple deprivation within Newton Abbot and Teignmouth.

- Considering the needs of people as they reach different stages of their lives; young, working age and retired, taking account of likely demographic changes.

Local plan aims and objectives.

- The Local Plan sets out the following aims, reflecting the points above and in line with the Council's corporate objectives:
- The sustainable development of Teignbridge will bring positive benefits to local communities, improving their self sufficiency and resilience and enhancing economic prosperity, individual wellbeing and a quality environment as follows:

Economic Prosperity

- Successful, growing local businesses providing a good range of jobs
- Vital, viable and attractive town centres
- All year round quality tourism
- Sustainable transport

Personal Wellbeing

- Meeting the need for affordable homes and aspirations for home ownership
- Improving infrastructure, facilities and services
- Resilience to climate change and energy shortages
- Increasing safety and reducing crime
- Clean air and water
- Specific consideration of young people and the elderly

Quality Environment

- Excellent design
- Increasing self-sufficiency
- Reducing waste and carbon emissions
- Protecting key natural and heritage assets

3.10. It will be seen that there is significant integration of the environmental evidence, priorities and objectives of the SEA (and indeed, the environmental issues for consideration within the SEA regulations) within these local plan objectives and therefore within the plan's policies.

Introduction to Assessment Process

3.11. To deliver the objectives, an initial set of policies and proposals were drafted in the Preferred Options stage of the Plan. This was in response to evidence of needs and priorities, based on an overarching strategy of the distribution of growth to the most sustainable locations within the district. They took account of the issues set out in the Issues and Options Report, and the consultation on that document,

which was accompanied by a Sustainability Appraisal Review Note. They further considered ongoing engagement with the main communities, including planning workshops and presentations, community level consultation and discussions with the town and parish councils involved.

- 3.12. In accordance with the SEA requirements, the Council prepared a scenario which envisaged that there was no plan implemented, the “no plan scenario”. This is described in the December 2013 Report, pages 11 – 14. It is not a “no change” scenario, since economic, social and environmental changes will occur whether there is a plan or not. The implications for environmental, social and economic issues were assessed, against which other scenarios could be compared.
- 3.13. Each policy set out within the Preferred Options, and consequently the Proposed Submission and the Inspector’s recommended Main Modifications to the Local Plan, were appraised using the objectives as set out, and appraised against the evolution of the district under the ‘no plan’ scenario. This enabled a reasoned, balanced judgement to be carried out on the effects on the environment of implementing the Plan. The policies were altered to reflect further consideration of environmental and other sustainability issues as set out in those assessments. The Planning Inspector had copies of the SEA reports and was in a position to consider these assessments in his assessment of the soundness of the local plan.
- 3.14. The June 2013 Report was prepared to provide additional clarity on the environmental and consultation influences on the preparation of the local plan, and to bring together the various key environmental and other constraints and limitations affecting the main settlements.
- 3.15. The further addendum to the SA/SEA, published in December 2013 alongside the Local Plan Inspector’s proposed main modifications, considered further detail in relation to the assessment of the plan. In particular, it elaborated further on the cumulative, secondary and synergistic effects including in combination with other relevant plans.
 - Secondary effects are not a direct result of the plan, but occur away from the original effect or as a result of complex pathway. An example of a secondary effect is the provision of additional homes in an area improving housing affordability, with beneficial secondary impacts on the health of some of the population.
 - Cumulative effects arise due to the combined impacts of different policies or proposals, each of which may have a limited impact but together provide for a more significant additive impact.
 - Synergistic effects interact to produce a greater than cumulative effect arising from the combination of impacts.
- 3.16. The term ‘interactive effects’ is used to cover all of these in the environmental report. The Local Plan has not been appraised against a ‘no change’ background, since that is not a feasible outcome of having no Local Plan in place. Instead it is being appraised against the ‘no plan’ scenario referred to above.

- 3.17. Chapter 5 of the December 2013 report sets out a detailed analysis of the interactive effects and Chapter 7 of the same report sets out the short, medium and long-term effects. The pro-forma appraisals of the policies and strategies set out within the October 2012 Report (pages 44-45 and Appendices 1, 2 and 3) and December 2013 Report (pages 99-100 and 170-179) include clear assessments of the positive and negative effects of the Local Plan.
- 3.18. The appraisal of the strategic and general policies is contained within the October 2012 Report Appendix 1 (pages 48 – 120) which sets out likely positive and negative effects against each of the sustainability objectives. A further explanation of the secondary, cumulative and synergistic impacts of these policies is contained within chapter 5 of the December 2013 report. Unless otherwise noted the impacts are likely to be sufficiently long term to be considered permanent. Where there appear to be reasonable alternatives, these are compared with the approach in the Local Plan. In particular, the policy approaches contained within the Preferred Options version of the plan and reasonable suggestions for alternatives put forward during consultation are also appraised and, where necessary, comparisons made.
- 3.19. The appraisals of the allocations (development proposals) are contained within the October 2012 report, Appendix 3, setting out likely positive and negative effects. Relevant secondary, cumulative and synergistic effects are described in chapter 5 of the December 2013 report. Appendix 2 of the October 2012 report contains appraisals of the reasonable alternative development sites considered during the preparation of the Local Plan.

Assessing Strategic and general policies

- 3.20. The proposed submission Local Plan contains a number of policies and proposals which set out the strategy of the plan or criteria for considering development proposals, and are not site-specific development proposals. Their inclusion arose from the assessment of sustainability context and in particular the guidance contained in the National Planning Policy Framework. A number of issues and potential options were raised in the Issues and Options Report which preceded the preferred options. The preferred options policies have been assessed against the 9 sustainability criteria compared with the option of not having the policy in the plan (which equates to the 'no plan' evolution, referred to earlier). The assessments are contained within Appendix 1 of the October 2012 report.
- 3.21. These appraisals, together with the consultation responses received to the preferred options and revisions to the draft proposed submission document following consideration by elected members have been used to define and alter the policies to improve their overall sustainability impact. The appraisals of the published policies are set out in Appendix 3 of the October 2012 report. A discussion of the reasons for including the policies is contained within chapter 5 of the December 2013 report. Further changes to a small number of these policies have been proposed by the Planning Inspector in his proposed modifications. These are of a detailed nature with limited sustainability impact and therefore no changes to the appraisals contained within the October 2012 report are required.

Assessing Site Allocation Policies

- 3.22. The appraisal of the strategic options is contained within pages 56 – 74 of the December 2013 report of the SEA (which built upon and expanded the appraisals in the December 2012 Report). Further discussion is set out in section 7 of this statement.
- 3.23. The potential sites considered for allocation in the Local Plan were all sites considered to be available, achievable and strategically suitable for allocation. The total list of sites assessed therefore consisted of sites allocated in the preferred options, sites promoted through the 2012 consultation together with any other sites which were considered achievable within the 2009 Strategic Housing Land Availability Assessment, provided they were located within or near a defined settlement. It is not possible to predict specifically which sites will be developed in the “no plan” evolution, and therefore it was not possible to assess the sites strictly against that scenario. Instead, the sites were all assessed by comparing the likely impact of development against the current impact of the undeveloped site. Thus, each site was assessed against a similar benchmark, allowing comparable results. This different approach for site-specific appraisals should be borne in mind when seeking to compare such appraisals with the appraisal of the impact of the Local Plan as a whole.
- 3.24. In the case of the potential sites, the timing of development has been assessed using the outcomes of the SHLAA 2009 report or the phasing policies/assumptions in the Local Plan where they are relevant. The assessment further considered potential improvement/mitigation measures for each site, in order to ensure that the least harmful/most positive impact was considered. These individual appraisals supported choices about which sites should be included in the Local Plan, and are included in Appendix 2 of the October 2012 Report.
- 3.25. The sites allocated in the Local Plan are assessed within Appendix 3 of the October 2012 report, with the reasons for their inclusion contained within the discussion in chapter 5 of the December 2013 report. These discussions take account of the modifications proposed by the Inspector at that time.

Assessing Against Reasonable Alternatives

- 3.26. Each of the strategic elements, general policies and development proposals have been compared with a range of reasonable alternatives which are assessed using the same general approach (i.e. by comparing against the “no plan” evolution using the sustainability objectives set out above). By comparing these assessments, and taking account of the results plus any other material issues, a decision can be taken as to which option is included within the Local Plan. This discussion is set out in the Chapter 5 of the December 2013 report.

Integration of Environmental Considerations

- 3.27. The policies and proposals of the Local Plan contain appropriate environmental considerations (in addition to social and economic considerations) which integrate

environmental concerns within the plan. This is set out in the following table (taken from the December 2013 Further Addendum).

Teignbridge SA Objective	Factors
<p>A Natural Environment <i>To protect, conserve and enhance the area's natural environment</i></p>	<p>Natural habitats and biodiversity; flora and fauna Wildlife and Species (dormice, bats etc) Natural Landscape character Coastal development</p>
<p>The submission Local Plan strategy for development distribution concentrates growth at the main towns. Whilst planned urban extensions will require development on greenfields, impact on natural habitats, biodiversity and landscape is mitigated through local plan policies.</p> <p>Submission Local Plan policy S1 Sustainable Development Criteria requires development proposals to perform well against a range of criteria, including those related to the natural environment (e.g. landscape and biodiversity). Policy S1 is supported by a suite of other policies in the Local Plan to mitigate the potential impacts of development on the natural environment. These are thematic e.g. S22 Countryside, EN2 Undeveloped Coast, EN8 Biodiversity Protection and enhancement, EN9 Important Habitats and Features, EN10 European Wildlife Sites, EN10 Legally Protected and Priority Species, EN12 Woodlands, Trees and Hedgerows, and also include site allocation requirements for specific mitigation measure to protect, conserve and enhance the natural environment. Site specific examples for mitigating the impacts of development on the natural environment include: the protection of hedgerows and connective woodland planting for dormice at TE3 West of Higher Exeter Road, Teignmouth; a requirement for a bespoke Greater Horseshoe Bat mitigation plan for development allocations around the Heart of Teignbridge (e.g. NA1 Houghton Barton, NA3 Wolborough) and at Bovey Tracey and Chudleigh. Site specific development allocations also, where necessary, include requirements to mitigate their landscape impact (e.g. DA4 West of Southdowns Road, Dawlish).</p> <p>Policy WE11 provides an overarching basis for delivering green infrastructure across the plan area, which can protect, conserve and enhance the natural environment. This is supported through more detailed site specific provision requirements for green infrastructure in development allocations, for example at NA1 Houghton Barton, NA3 Wolborough (both at Newton Abbot) and SWE1 South West of Exeter urban extension.</p> <p>The submission Local Plan includes two site based proposals for suitable alternative natural greenspace (policy DA7 Dawlish Warren Coastal Park and policy SWE3 Ridge Top Park at South West Exeter), in response to Habitat Regulations requirements to mitigate the impacts of visitors through planned development on protected European sites at the Exe Estuary SPA and Dawlish Warren SAC. The Council's proposed minor changes to the Proposed Submission Local Plan make clear the Council in collaboration with other local planning authorities for the South Hams SAC, will prepare and publish, as a supplementary planning document (SPD) a Greater Horseshoe Bat Mitigation Strategy. The proposed Mitigation Strategy SPD will identify the requirements for and provision of measures necessary to mitigate the likely affects of all types of developments (both alone and in combination with other projects) in all areas where there could be an adverse affect on the integrity of the South Hams SAC.</p>	

Teignbridge SA Objective	Factors
<p>B Built Environment</p> <p><i>To preserve and improve the areas built environment and heritage assets</i></p>	<p>Design and build quality of new development</p> <p>Cultural heritage</p> <p>Archaeology – SAMs</p> <p>Conservation areas and design</p> <p>Townscape/regeneration</p> <p>Gateways and public art</p>
<p>The maintenance and enhancement of historic interest features is included in Policy S1 Sustainable Development. Policies S2 Quality Development and WE8 Domestic Extensions, Ancillary Domestic Curtilage Buildings and Boundary Treatments will serve to mitigate what might otherwise be the potential adverse impact of poorly designed development on the built environment. The preservation and improvement of the built environment and heritage assets is supported elsewhere in the submission Local Plan through other policies including EN5 Heritage Assets, and, where appropriate, specific requirements of site allocations. For example, policy NA3 Wolborough, Newton Abbot requires development to respect the setting of the parish church of St Mary the Virgin. Certain site allocation policies include a requirement for comprehensive landscape and design led masterplanning, which can mitigate the impact of proposed development on the built environment.</p>	
<p>C Climate Change</p> <p><i>To mitigate and adapt to possible effects of climate change</i></p>	<p>Provision of open space in urban environments</p> <p>Reducing the need to travel (carbon savings)</p> <p>Reduce flood risk and the threat to people and property</p> <p>Cycle and walking provision to support reductions in car travel.</p> <p>Promote the usage of renewable sources of energy and support energy efficiency.</p>
<p>The submission Local Plan mitigates the impact of planned growth in Teignbridge on climate change at a strategic, thematic and site allocation level.</p> <p>The focus of development at the main towns, coupled with policy requirements to improve the self-containment of places (local provision of education, health, shops, employment, community facilities and open space), will help reduce the need to travel. This is supported through measures to help modal shift to public transport, cycling and walking (e.g. Policy S1 Sustainable Development Criteria, S2 Quality Development and site specific provisions).</p> <p>Submission Local Plan Policy S6 resilience will seek to minimise the future impact of climate change and fossil fuel scarcity from development, supported through Policies S7 Carbon Emission Targets and EN3 Carbon Reduction Plans. Policy EN4 will mitigate flood risk through the sequential approach to the location of development and sustainable drainage.</p> <p>Site specific mitigation against the impact of development on climate change include, for example, Policies NA1 Houghton Barton and NA3 Wolborough, Newton Abbot (maximise opportunities for either the generation of on-site renewable energy at a domestic scale or</p>	

Teignbridge SA Objective	Factors
	<p>community scale renewable energy generation). The Council's proposed minor changes to Policy SWE1 South West of Exeter include a requirement for the provision of a site wide district heating system to which all developments will connect, with preference given to using heat from the Marsh Barton Energy from Waste facility, subject to viability.</p> <p>The environmental impacts of development are mitigated further through policies S7 and EN3, which collectively will work to reduce carbon emissions and minimise carbon footprint. The use of Sustainable Urban Drainage Systems (required through Policy S2) will mitigate the potential for development to cause flood risk through increased surface run-off.</p>
<p>D Resource Use</p> <p><i>To minimise the loss or degradation of finite natural resources.</i></p>	<p>Soils quality and supply</p> <p>Water quality and its future supply</p> <p>Minimise waste (reuse, recycle, recover)</p> <p>Loss of quality agricultural land</p> <p>Sterilisation of mineral resources</p>
	<p>Policy S1 includes the impact on mineral and agricultural production in the Local Plan's sustainable development criteria. Mitigating the impact of development on water and soil resources is aided through policies S6 Resilience and S11 Pollution.</p> <p>The Local Plan's strategy for development distribution focuses major development allocations at the main towns. This avoids the two highest grades of agricultural land (grades 1 and 2), with the exception of a small part of DA2, North west of Secmaton Lane);</p> <p>Newton Abbot (a small part of NA3 Wolborough and also NA5 Buckland Barton);</p> <p>Chudleigh (CH5 Land at Grovelands and a small part of CH4 Land at Colway Lane)</p> <p>The development distribution avoids internationally important ball clay minerals deposits in the Bovey Basin, to the north of Newton Abbot. Policy NA3 Wolborough, Newton Abbot mitigates impact on sand and gravel deposits through promoting pre-extraction of the mineral before development takes place.</p>
<p>E Jobs and Local Economy</p> <p><i>To foster an entrepreneurial economy with improved productivity, providing a strong employment offer.</i></p>	<p>Economic generating uses (including housing and population growth)</p> <p>Productivity – access to labour supply</p> <p>Employment offer – more business space</p> <p>Tourism/commercial cultural and leisure provision</p> <p>Skills training</p>
	<p>Policy S3 will mitigate the forecast need for employment land in the Teignbridge planning area. It promotes an improved balance of jobs to working population, with provision for about 60 hectares of land for business, industrial and warehousing over the next 20 years. This provision will support economic growth, job creation, increased prosperity and help address multiple deprivation. Maintaining a deliverable supply of 15 hectares of land for business, industrial and warehousing uses at any one time will help mitigate the potential for the loss of businesses seeking to expand or relocate within Teignbridge, to</p>

Teignbridge SA Objective	Factors
	<p>locations outside the planning area. The delivery of Policy S3 is supported through Policies EC1 to EC5, and also the allocation of development sites for business, warehousing and industrial uses at the main towns (e.g. 18 hectares at NA1 Houghton Barton and 10 hectares at NA3 Wolborough, Newton Abbot, and 19 hectares adjacent to Peamore on the edge of Exeter (Policy SWE2) (following the Inspector's main modifications).</p> <p>The creation of new jobs in Teignbridge can mitigate potential environmental impacts of significant housing provision through improving the self-containment of places and reducing the need for working residents to travel outside the plan area. This can reduce use of fossil fuels and pollution from vehicle exhaust emissions.</p> <p>Policy S12 supports the tourism economy in Teignbridge, including the retention and enhancement of tourist accommodation and attractions. This can mitigate the potential for loss of visitors to alternative destinations outside the district.</p>
<p>F Town Centres</p> <p><i>To strengthen and safeguard the vitality and viability of our town centres</i></p>	<p>Strengthen and safeguard the vitality and viability of town centres</p> <p>Relationship between new development and town centres</p>
	<p>The Local Plan includes a suite of land use policies that can help mitigate the impact of current economic conditions, out of town and internet shopping on the vitality and viability of town centres in Teignbridge. These policies can help attract investment in town centres in Teignbridge through the allocation of site for new shops, applying the 'sequential test' for retail and leisure development in the NPPF, protecting prime retail frontages and giving flexibility for other active uses in town centre areas. This can also mitigate against potential reduced competitiveness of town centres in Teignbridge that could result from investment and improvements to town centres outside the planning area.</p> <p>The Local Plan includes a suite of policies to support town centres, including EC4 Large scale retail development, EC7 primary shopping frontages, EC8 secondary shopping frontages. Policy NA8 supports town centre development at Newton Abbot, including the delivery of a broader evening economy.</p> <p>Policy EC10 local shops provides for residents' day to day shopping needs within walking distance, in locations within or adjoining defined settlements. Regeneration can also support the vitality and viability of town centres, through Local Plan policies including TE4 (Teignmouth) and DA12 (Dawlish).</p> <p>Major new comparison goods retail space is allocated at Newton Abbot town centre through policy NA9 Town Centre Markets Area. Mixed use housing allocations elsewhere at Newton Abbot (NA1 Houghton Barton, NA3 Wolborough), Kingskerswell (KK1 Land off Torquay Road and Embury Close), and South West of Exeter (SWE1) include provision for local shops.</p> <p>Policies KS4, KK5, BT5 and CH8 provide for environmental enhancements that can support town and village centres at Kingskerswell, Kingsteignton, Bovey Tracey and Chudleigh.</p> <p>Strengthening and safeguarding the vitality and viability of town centres in Teignbridge can mitigate the potential environmental impacts of significant housing provision, where</p>

Teignbridge SA Objective	Factors
improved retail choice can reduce shopping trips to outside the plan area and associated use of fossil fuels and pollution from vehicle exhaust emissions.	
G Housing <i>To provide and maintain a sufficient supply of good quality, mixed housing, including an appropriate level of affordable housing</i>	Supply of housing Housing mix Efficiency of housing Access to services Balanced places providing access to an appropriate mix of services and facilities. Housing affordability
<p>Policy S4 will mitigate forecast housing need, provide more choice and improve the suitability of housing accommodation across the spectrum of the housing market in the Teignbridge planning area. It will also help to address housing affordability, homelessness and multiple deprivation. The average provision of 620 new homes per year over the plan period accords with objectively assessed housing needs.</p> <p>The delivery of Policy S4 is supported through the allocation of development sites for new housing at the main towns and on the edge of Exeter, including large mixed use urban extensions.</p> <p>The concentration of significant housing as part of large mixed use urban extensions at the main towns will reduce their potential environmental impact, avoiding dispersed development in rural areas. Concentrated urban form (e.g. through policies NA1 Houghton Barton and NA3 Wolborough at Newton Abbot, and SWE1 South West of Exeter urban extension) will place new housing closer to shops, schools, employment opportunities, open space, recreation and community facilities. It will therefore support walking, cycling and public transport, thereby reducing the need to travel by car, use of fossil fuels and pollution from vehicle exhaust emissions.</p> <p>Policies WE1 to WE7 will help to mitigate the need for affordable housing and for homes for the travelling community, with specific requirements for travellers at the largest allocations NA1 and SWE1.</p> <p>Policy S21A will help mitigate the impact of housing through identifying settlement limits at the main towns and villages, within which limited development will be permitted subject to being consistent with the provisions and policies of the Local Plan. Policy S22 makes clear that outside the defined settlement limits development will be strictly managed. This will support the urban focus of the plan's development strategy and help avoid development in unsustainable rural locations.</p>	
H Health & Wellbeing <i>To support healthy lifestyles and a healthy local living environment</i>	Safe and secure environment with a reduced fear of crime Access to open space and recreation Limit air, noise and light pollution to levels that do not damage human health or natural systems Active forms of transport ensuring integration of public transport, walking and cycling opportunities

Teignbridge SA Objective	Factors
	<p>Air Quality</p> <p>Fear of crime.</p> <p>Public recreational and leisure opportunities</p> <p>Social Deprivation</p>
	<p>Submission Local Plan Policy S2 will mitigate the potential for adverse impact of development on health and well-being, community cohesion, and public safety through the requirement for quality design. This can be supported through the requirement for masterplanning at the strategic development allocations (e.g. through policies NA1 Houghton Barton, NA3 Wolborough, SWE1 South West of Exeter urban extension, and DA2 North West of Secmaton Lane, Dawlish).</p> <p>The promotion of health and well-being is also supported by policies S1 Sustainable Development Criteria, S11 Pollution (reducing the impact of noise, air, water, light, land and other forms of pollution from development), EN6 Air Quality, and EN7 Contaminated Land. Strategic policies for Newton Abbot, Kingsteignton, Kingskerswell, Dawlish and Teignmouth (S14 to S18) include provision for improvements to air quality.</p> <p>Policy S9 Sustainable Travel will support healthier modes of travel, including walking and cycling. Health benefits can result from physical exercise and the avoidance of travel modes that can cause air and noise pollution.</p> <p>Development allocations in the Local Plan substantially avoid areas that are at risk from flooding (and which as a consequence could pose a risk to human health).</p> <p>The submission Local Plan makes significant provision for public recreational and leisure opportunities, including through green infrastructure (Policy WE11), the protection of recreational land and buildings (Policy WE13).</p> <p>Policy HT1 can mitigate the potential transport impacts of development focused at the Heart of Teignbridge, through new road infrastructure to support new growth areas, support for rail improvements, and comprehensive walking and cycling routes that connect within the Heart of Teignbridge and to nearby towns and villages. Walking and cycling provision supports urban extensions elsewhere in the planning area, including at SWE1 South West of Exeter and DA2 North West of Secmaton Lane, Dawlish.</p>
<p>I Infrastructure</p> <p><i>To ensure sustainably balanced places are created or maintained providing access to an appropriate mix of services and facilities.</i></p>	<p>Green infrastructure</p> <p>Roads and transport</p> <p>Area-wide services (schools, health care, etc)</p> <p>Community centres</p>
	<p>Policy S5 will mitigate potential unsustainable development through requiring the provision of new and improved infrastructure, such as education, health, transport, recreation facilities and green infrastructure in planning for the growth of balanced places. This strategic policy is supported through other policies in the Local Plan (e.g. WE11 Green Infrastructure), and site based allocations detailing specific infrastructure requirements.</p> <p>Policies WE12 and WE13 will help to maintain and protect local facilities and recreational</p>

Teignbridge SA Objective	Factors
<p>land and buildings, thereby mitigating their potential loss through development proposals.</p> <p>Policies HT1 to HT3 include site specific requirements for the provision of transport, education and green infrastructure at the Heart of Teignbridge. This is also the case for policy SWE1 in respect of the urban extension at the South West of Exeter, and policies DA9 and DA10 at Dawlish.</p> <p>The Local Plan will make possible the implementation of a Community Infrastructure Levy, which will be central to the funding of strategic infrastructure across the plan area.</p>	

Habitat Regulations Assessment

- 3.28. The Habitat Regulations set out a separate legal requirement to consider the likely significant effects of a plan or programme on any European Wildlife Site. There are three such sites within Teignbridge, and a number of other sites nearby. Accordingly, the council prepared a Habitat Regulations Assessment (HRA) of the Teignbridge Local Plan, and took this into account in the preparation of the plan alongside the SA/SEA.
- 3.29. A draft Habitat Regulations Assessment was produced alongside the Issues and Options Report, listing the potentially affected European sites. The options considered within the Issues and Options report were considered for their potential impacts on these sites. Issues raised included the likely need to introduce “suitable alternative natural green space” (SANGS) as a mitigation measure to offset recreational impacts on European sites (particularly the Exe estuary and Dawlish Warren). The potential impact of housing provision was referred to, but potential mitigation considered. It was noted that all of the settlements had potential impact on one or more European sites, and that this would need to be considered in the strategic decision making. Comments were made on the various strategic options.
- 3.30. A more detailed draft HRA was undertaken of the Preferred Options consultation, considering the additional work that had been undertaken and the mitigation measures proposed within the plan. The assessment concluded that there were likely to be significant effects on the South Hams, Exe Estuary and Dawlish Warren sites, and the potential for an effect on the Pebble Bed Heaths, within East Devon. Potential mitigation effects were set out in the draft HRA including;
- Financial contributions towards management of the Exe Estuary, Dawlish Warren and Pebblebed Heaths and provision of Suitable Alternative Natural Greenspace (SANGS), specifically at Dawlish and South West Exeter;
 - Surface water disposal management;
 - Management of tourism;
 - Further assessments of specific sites particularly in relation to the flyways and sustenance zones associated with the South Hams SAC;
 - Policies to protect and enhance strategic habitats.

- 3.31. The report concluded that, with these mitigation measures, most of the impacts could be mitigated. Natural England commented on the draft HRA which confirmed that the document follows practice guidelines and was well researched and thought through. However, there were a number of issues raised and further considerations required.
- 3.32. Taking these comments into account, the council prepared a draft HRA for the proposed submission local plan and consulted Natural England on the document. However, Natural England were still concerned at a number of issues in relation to this draft, and sought additional work on the HRA in advance of submitting the local plan. Accordingly, the Council delayed the submission of the local plan in order to permit a significant rewrite of the HRA, employing consultants.
- 3.33. The final report concluded that the majority of policies in the local plan were not likely to have a significant effect on any European site. However the overall quantum of development, its nature and proximity to the sites meant that likely significant effects could not be ruled out in the absence of mitigation measures. A series of mitigation measures were recommended, and it was concluded that with these in place there would be no likely significant effect. In summary, these were;
- Policy restrictions on development, including the requirement for a greater horseshoe bat mitigation strategy as part of many of the allocations;
 - Landscape scale greater horseshoe bat mitigation strategy to be prepared, updating and building on existing cross-boundary guidance;
 - Continuing and updating the existing joint interim approach to the protection of the Exe Estuary and Dawlish Warren;
 - Ensure that the current water quality monitoring arrangements and sewerage provision are appropriate;
 - Consider the air quality implications of intensive agriculture.
- 3.34. The local plan incorporated the proposed mitigation measures through a series of minor amendments, allowing Natural England to withdraw a significant number of their earlier comments. These minor modifications were confirmed by the Council when the plan was adopted and are contained within the published local plan adoption statement, required under the 2012 Local Plan regulations. The Inspector considered the mitigation measures in his report and did not recommend any further relevant changes.
- 3.35. The December 2013 Report further considered and described the likely interactive effects of the plan's policies and proposals (i.e. cumulative, synergistic and secondary effects, defined further above). This includes specific reference to the effects in combination with other plans and programmes. The potential for interactive effects in combination with other plans and programmes is described in chapter 4 of the December 2013 report.

The overall Impact of the Local Plan

- 3.36. Taking account of these interactions the report sets out the overall impact of the Local Plan as a whole, when compared against the evolution of the "no plan"

scenario. This is in Chapter 7 of the December 2013 report, and set out in more detail at the end of this section. Against each of the sustainability objectives, there is a forecast of the impact of the plan in the short (up to 5 years), medium (6 – 10 years) and long (over 10 years) terms with an explanation of the key policy and development drivers. The forecast is a comparison against the likely evolution of the area without the implementation of the plan (i.e. the “no plan” evolution as described in pages 10 - 14 of the December 2013 report).

- 3.37. The assessment of the overall impact of the plan, when compared with the “no plan” scenario indicates overall benefit in most of the social, environmental and economic factors considered during the preparation of the plan. Benefits are forecast against the built environment (incorporating the SEA population, material assets and cultural heritage issues), climate change (incorporating climatic factors), jobs and local economy (incorporating population and material assets), town centres (incorporating population and material assets), housing (incorporating population and material assets), health and wellbeing (incorporating population and human health) and infrastructure (incorporating material assets). No benefits or harm are indicated against natural environment (incorporating biodiversity, fauna, flora and landscape). Some harm is indicated against resource use (incorporating soil, water, air and material assets), due to increased development of existing undeveloped (mainly agricultural) land compared with the “no plan” scenario. Given the scale of housing and employment land required to meet the objectively assessed needs, and the benefits in other areas that this level of development brings, this disbenefit is considered appropriate in the context of the SEA analysis.
- 3.38. Overall the forecast is for some environmental gains to result from the plan’s policies and proposals, although with some disadvantages against resource use, but significant social and economic benefits arising. The following table is taken from the December 2013 report, and reflects the impact of the adopted plan, incorporating the main and minor modifications, which have overall had limited sustainability impact. The difference between the December 2013 Proposed Main Modifications and the final Inspector’s Report do not impact on this forecast enough to lead to a change.

Overall Local Plan Impact compared with the evolution of the area without the implementation of the plan.		Timescale		
Objective	Comments and explanation	S	M	L
A Natural Environment	<p>The overall level of development is higher than the “no plan” evolution with approximately 150 hectares of additional greenfield land developed. However, the process of preparing the Local Plan has involved careful choices of sites to minimise environmental impact (taking account of other plan and sustainability objectives such as travel minimisation), generally avoiding the most sensitive areas and avoiding damage to the most protected areas/sites. The allocations and the policies contain specific and general requirements to protect and enhance biodiversity and the natural environment. By comparison, without a plan there would be ad hoc release of sites depending on which planning applications were made, and no comparative choices made. In particular, a much higher level of development in the villages would have a comparatively higher impact. It would also be more difficult to ensure that appropriate mitigation was included. The development proposals as a whole have the potential to impact on European sites in combination, however the mitigation policies and specific site requirements incorporated into the plan will ensure that harm to the sites is prevented (see the Habitat Regulations Assessment documentation). It is possible that the “no plan” evolution will, by contrast, lead to in-combination effects that it is difficult to manage on an ad-hoc development basis without the use of Community Infrastructure Levy. The implementation of the green infrastructure strategies allow for biodiversity benefits from a strategic approach. Accordingly, even with higher levels of development it is considered that the overall impact on the natural environment is no greater under the plan proposals. With the priority given to the protection of European sites, the early provision of mitigation measures should ensure that there is no short term impact from development. The landscape mitigation on edge of town sites may take a few years to start to become effective. However, this is a continuous process across the district, with sites coming forward throughout the plan period, and therefore there is unlikely to be significant variations in the short, medium or long term impact. The provision of a strategic network of green infrastructure is likely to be a longer term project building through the plan period.</p>	0	0	0

Overall Local Plan Impact compared with the evolution of the area without the implementation of the plan.		Timescale		
Objective	Comments and explanation	S	M	L
B Built Environment	The policies of the Local Plan ensure that high quality development occurs, and this combines with the proposals for enhancing town centres (including the development of underused town centre sites) will act to bring about significant improvements in these key heritage areas. The villages, the other key areas for heritage, will remain broadly unchanged through the plan period (whereas, under the no plan evolution, there would be likely to be considerable development in these sensitive locations). The major development areas will be subject to masterplanning and all development will be required to have high quality design and layout. The provision of community infrastructure levy may provide significant resources towards town centre enhancements (including those available to town councils). Cumulatively, therefore, a significant built environment benefit is forecast. The benefits to the built environment are forecast to build up through the plan period, as enhancements are implemented and high quality developments come forward. This is particularly so compared with the “no plan” evolution which is forecast to bring about an increasing level of development at the heritage- sensitive villages. The benefits of the Local Plan in the long term have been increased compared with the October 2012 commentary, to reflect the additional work undertaken on the “no plan” evolution and the strengths and weaknesses of the alternative distribution strategies in chapter 5 of this report.	0	+1	+2
C Climate Change	Compared with the implications of the no plan evolution, with its dispersal of development to the villages, the concentration of development at the towns and on the edge of Exeter will lead to significant reduction in travel. This impact will be enhanced interactively with better town centres to reduce outflow of expenditure to higher order settlements outside the district, improved provision of public transport and cycling and increases in local employment provision in and around the main towns. The inclusion of a mix of uses in the major sites will support this overall strategy, and the requirement for major developments to prepare and implement carbon reduction plans will add to the potential for climate change mitigation. Significant reductions in carbon emissions will therefore result. This will, of course, only work if it acts in concert with a similar global effort in accordance with various international treaties and agreements.	+1	+2	+2

Overall Local Plan Impact compared with the evolution of the area without the implementation of the plan.		Timescale		
Objective	Comments and explanation	S	M	L
	Increases in tourism may involve greater travel to the area, but this will likely be at a relatively low level, and therefore balance against the increased employment and reduced need for out-commuting. Overall, a positive benefit is forecast. There will be only limited impact in the short term, as during this time development will mainly be from already permitted development. The allocations generally avoid areas of floodplain, but it is likely that these will also be avoided without the plan, as a result of strong national policies. The plan will show more significant impacts in the medium to long term, as development increasingly diverges from the “no plan” evolution.			
D Resource Use	The Local Plan allocates about 150 hectares of additional greenfield land for housing and employment compared with the “no plan” evolution forecast. The impact of this additional land will increase through the plan period. This level of greenfield development is difficult to avoid without significant increases in building density with an impact on design and biodiversity, if the objectively assessed needs of the area are to be met. No comparative impact on water, waste and mineral sterilisation. The negative impacts in the longer term have been increased compared with the assessment in the October 2012 report, to reflect the improved understanding of the “no plan” scenario described in pages 10-14 of this report.	-1	-2	-2
E Jobs and Local Economy	The strategy provides for significant increases in economic activity within the district, from a number of sectors. The development of the employment allocations, outstripping considerably the likely development rates under the no plan evolution, would bring forward considerable employment (up to 6000 additional jobs). Enhanced town centres, including specific allocations at Newton Abbot, would be expected to bring forward additional jobs, and act to encourage the expansion of other town centre businesses as a secondary effect, working cumulatively with the retail policies of the Local Plan. The infrastructure investment (particularly in transport) would enhance the economic competitiveness of the area, therefore making the development of the allocated sites more likely, and also bringing forward increased business growth in other locations. The allocation of sufficient housing to meet the needs of the area will both create jobs directly during construction (a temporary effect on a particular site, but lasting throughout the	+1	+2	+3

Overall Local Plan Impact compared with the evolution of the area without the implementation of the plan.		Timescale		
Objective	Comments and explanation	S	M	L
	plan period cumulatively) but will also improve housing costs and therefore have economic benefits for attracting workforce for local employers, and also for increasing the potential for local expenditure by householders. The economic impact overall is very significant, and increasing over the plan period. With similar strategies in other nearby districts, the cumulative effects for Devon as a whole should be very strong.			
F Town Centres	The plan contains proposals for development and enhancements at the town centres, which would bring about significant improvements. Improvements to public transport in Newton Abbot and Dawlish should support these enhancements by making access to these town centres easier for nearby populations. Some of these enhancements may occur under the “no plan” evolution, although with reduced certainty through lack of a Local Plan allocation and/or reduced funding as a result of Community Infrastructure Levy not being possible under that scenario. Some of the enhancements are likely in the short/medium term, with more significant improvements taking longer to come about.	+1	+1	+2
G Housing	The Local Plan proposals would provide about 2,400 additional dwellings over the plan period (120 per year on average) compared with the expected supply in the absence of the plan, including additional pitches for Gypsies and Travellers. This additional supply would act, particularly interactively with other authorities’ increased supply in the Exeter Housing Market Area, to improve affordability and therefore access to housing for a large number of additional households. This effect would work cumulatively with the increased household income arising from local economic growth in terms of access to housing finance. The introduction of Community Infrastructure Levy may act to reduce affordable housing proportions, but this is balanced by the overall increase in supply. The impact would be felt to some extent in the short term, but this impact would increase as the plan proposals were implemented. The benefits have been increased compared with the October 2012 report, to reflect improved understanding of the ‘no plan’ scenario described in 10-14 of this report.	+1	+2	+2

Overall Local Plan Impact compared with the evolution of the area without the implementation of the plan.		Timescale		
Objective	Comments and explanation	S	M	L
H Health and Wellbeing	The provision of additional cycle and pedestrian routes should act cumulatively with the concentration of development adjoining the main settlements to encourage modal shift from car use to cycling and walking for leisure, shopping and commuting purposes. This should act to improve physical activity and therefore, as a secondary effect, improve local health. Greater housing affordability and improved access to jobs without the need to commute will also act as an accumulation of secondary effects to enhance local health and wellbeing. A further secondary impact arises if climate change mitigation is successful (which will require cumulative action with other local authorities and countries) in terms of health benefits. Overall, the impact on local health and wellbeing should be positive. Given the slight delay in provision of homes and jobs, and associated infrastructure, and the time taken to change travel habits, it is expected that these benefits would arise in the medium to long term.	0	+1	+1
I Infrastructure	The plan brings forward significant investment in transport, social, green and other infrastructure, and will allow the introduction of Community Infrastructure Levy to fund significant elements. Urban extensions, supported by the strategy of concentrating development at the existing urban areas, provide greater on-site provision than smaller sites, and the inclusion of appropriate requirements in policies will lead to greater provision than under the “no plan” evolution. Increased rural tourism and employment may have some beneficial impact on local rural facilities through increased local expenditure. The provision will increase through the plan period.	+1	+1	+2

3.39. The Planning Inspector broadly supported this assessment in his report, paragraphs 8 to 10, as follows:

Does the Local Plan present a clear spatial vision for the Borough, recognising its distinct qualities and specific communities?

A key element of the Plan is to meet the housing and employment needs of the District through what was described as 'transformational change', in essence a marked increase in the level of growth up to 2033 compared with the previous decade. The strategy seeks to concentrate a large majority of new building in the Heart of Teignbridge (HoT) area, focussed on the main town in the District, Newton Abbot. In broad terms this appears to be a logical response, and one which should be

capable of bringing about sustainability benefits. There is a clear audit trail from the preferred options stage which indicates how the chosen strategy would provide for a justified level of housing and employment growth which meets the objectives of the National Planning Policy Framework (NPPF).

The concentration of growth in the HoT in comparison with other patterns of more dispersed development would accord with the fundamental planning objective to promote sustainable development. The strategy responds to the physical characteristics of the district by protecting its most attractive landscapes and its other environmental assets, including protected habitats and species. This includes provisions to ensure that any wider impacts on areas and protected flora and fauna beyond the district boundary would be averted or fully mitigated before development takes place. I consider that the Plan has been positively prepared to address housing and employment shortfalls while including positive measures to protect environmental assets, including the retention of important natural features and wildlife.

In broad terms, will the LP provide an appropriate balance between the housing and employment needs of the District, while safeguarding its environmental assets?

There was some strong opposition to this strategy, primarily on the grounds that it would not be possible to achieve the social and economic growth objectives without an unacceptable impact on the landscape, ecological and other environmental assets of the District, in conflict with the objective of retaining a high quality environment. For the reasons explained in more detail throughout the report, I consider the amount of growth proposed would not have unduly adverse effects on the landscape and ecology of the District as a whole. Impacts on protected species and areas of special wildlife interest can be adequately protected by the policy framework within the Plan, including development criteria for the main allocated sites. As the analysis in the SA shows, the very significant benefits of new housing and employment outweigh any local environmental disadvantages related to the urban extensions to the main settlements.

4 How the environmental report has been taken into account

Introduction

- 4.1. The SA/SEA work has contributed to the development of the plan by assessment of its sustainability during its development. The consideration of environmental issues set out in the environmental reports and other local plan evidence documents have ensured that environmental issues have been addressed and that where necessary mitigation or other responses have been applied to seek to reduce adverse environmental effects. Environmental issues have been considered in the context of the wider sustainability issues (ie including social and economic objectives) during the plan's preparation, in accordance with the requirements of the Planning Act.
- 4.2. The environmental/sustainability reports have also highlighted the scale of any environmental adverse impacts and whether there were likely to be any combined adverse impacts. From section 3 it will be seen that, taking account of the mitigation measures proposed, the plan's impact is forecast to be positive in the majority of the sustainability factors. The impact on the natural environment is considered to be broadly neutral, with some harm indicated against resource use, arising from increased development of undeveloped (mainly agricultural) land. This indicates the extent to which the SA/SEA work has been taken into account in the plan's preparation, and the successful incorporation of an appropriate strategy, proposals and policies within the plan.

Strategic Housing Land Availability Assessments

- 4.3. Whilst not formally part of the environmental report, the Council published assessments of the potential housing development sites as part of the Strategic Housing Land Availability Assessment reports in the lead up to the plan's preparation. These contained environmental information including wildlife, heritage, landscape, flooding as well as other key planning considerations on a site-by-site basis. These assessments were a key background element in the plan's preparation, including in the site-specific assessments contained within the environment report.

Key Issues Addressed

- 4.4. The majority of key issues raised in the Scoping Report were addressed through the preparation of the plan. In most instances that was accomplished through material in the written statement and/or policies and proposals of the document. With other issues, the resolution was considered to be achievable through the interaction between the policies and guidance in the plan.
- 4.5. The process of preparing the Sustainability Appraisal has led to improvements in the overall sustainability of the plan, via improvements in the performance of the policies and the allocations. The appraisal has taken account of comments made during consultation through the preparation of the Local Plan, where this has provided additional insight or information to be considered.

- 4.6. The changes are most obvious between the Preferred Options Core Strategy, published for consultation in January 2012, and the Proposed Submission Local Plan, approved by Councillors in September 2012. There are a large number of technical, minor, or textual changes throughout the plan which reflect small improvements to sustainability (or are included for other planning reasons such as to aid implementation). However, there are a number of more fundamental changes to the contents of the plan.

Overall Housing Provision

- 4.7. A reduction was made in housing provision within the plan period from 740 per year to 620 per year, to reflect revised information on housing needs, independently prepared. There would be a resulting reduction in the positive benefits of the plan in relation to housing, economy and health, but since the plan still meets the assessed level of need, this impact is acceptable. As a result, there is less development of Greenfield land proposed, and a marginal reduction in the overall natural environment impact of the proposals. The reductions are mainly at Newton Abbot and Teignmouth with a smaller reduction at Bovey Tracey.
- 4.8. In particular there are less affordable dwellings proposed, arising from the overall reduction in housing, but also a reduction in the percentage targets on sites. This will reduce the housing and health benefits of the plan, but is necessary to reflect the viability evidence obtained, and the need to fund appropriate infrastructure for the area.

Newton Abbot

- 4.9. The overall provision at Newton Abbot was reduced, primarily through a reassessment of the capacity of town centre sites, and reductions in the major allocations to the west and south of the town. These Greenfield reductions gave improved ability to mitigate against potential impacts on the Greater Horseshoe Bat flight lines associated with the South Hams SAC, arising from work in the Habitat Regulations Assessment.
- 4.10. An employment site at Newton Abbot was deleted from the Local Plan as it was no longer available, with some loss of potential jobs. However, this site was re-inserted at Main Modifications stage of the Local Plan due to changed circumstances of the owner (see Main Modification 1 below). A reduced provision for retail development in the Newton Abbot and Teignmouth town centres reflects reduced need, but also a reassessment of the site capacities. The implications of these are a reduction in economy benefits of the plan, although again with the reduced housing provision this is not a major sustainability concern.

Teignmouth

- 4.11. One key piece of road infrastructure, west of Teignmouth, has been removed from the plan. Evidence indicated that it would be very expensive and difficult to provide, is not value for money and the funding needed to bring it forward would therefore

be better used elsewhere. This necessitated a significant reduction in housing provision at Teignmouth, which also had benefits in natural environment impact.

Bovey Tracey

- 4.12. The level of provision at Bovey Tracey reduced, reflecting concerns over flood risk and the Greater Horseshoe Bat implications of developments. The housing site previously allocated at Bradley Bends was removed from the plan at that stage, arising from public concern. However this site was later granted permission for housing at appeal, a decision reflected in Main Modification MM6 (see below).

Landscape Policies

- 4.13. The plan now contains a policy to protect the Area of Great Landscape Value. Additional strategic open breaks are identified between Newton Abbot – Kingsteignton, between Exeter – Exminster and between Newton Abbot – Torquay. Protection of the Undeveloped Coast is carried forward. These changes improve the natural and built environment impacts of the plan.

Inspector's recommended Main Modifications

- 4.14. The Inspector initially proposed 13 main modifications to the local plan in December 2013. These can be summarised as:

- MM1; extension of NA1 to incorporate additional employment land.
- MM2; requirement to update leisure and retail study.
- MM3; modify EN3 to refer to viability.
- MM4; delete DA1 and extend DA2 to incorporate additional employment land.
- MM5; extend site DA5.
- MM6; add policy BT2 for permitted housing.
- MM7; delete site BT2B.
- MM8; alterations to site CH2.
- MM9; delete site KS2.
- MM10; delete site KS7.
- MM11 amend policy wording for SWE1.
- MM12; extend site SWE2.
- MM13; modify policy wording EC6.

- 4.15. The Council considered the sustainability implications of these in the December 2013 environmental report (the Further Addendum), which was provided to the Inspector. The main modifications were themselves subject to consultation, alongside the December 2013 report, and the comments on both documents were provided to the Inspector for his consideration.

Inspector's Final Main Modifications

- 4.16. In the event, in his final report to the Council the Inspector recommended only 12 main modifications. He decided not to confirm MM12, the extension of the allocated employment land SWE2. The reversion to the submitted plan in the case of policy SWE2 means that the original assessment of that proposal is still valid

and no further work is required on the SEA to meet this point. MM5 contained a minor wording change from that previously advertised, with no significant sustainability implications. The other 11 main modifications were the same as those previously proposed by him. The plan was adopted on 6th May 2014, incorporating the 12 recommended main modifications.

Council's Minor Modifications

- 4.17. In accordance with the Planning Act, the Council can also incorporate minor modifications which do not materially affect the policies of the plan. A list of minor modifications, many of which had been submitted with the plan, was approved for inclusion in the local plan. These are set out in the local plan Adoption Statement published on the Council's website in accordance with the Local Plan regulations 2012. There are no significant implications for the SEA arising from these, which update and clarify the intentions of policies, particularly those arising from the Habitat Regulations Assessment in relation to the European Wildlife Sites.

5 How opinions expressed in responses to consultations have been taken into account

Introduction

- 5.1. The preparation of the SA/SEA is a process which is integrated closely with the preparation of the local plan. The responses to the local plan have themselves influenced the environmental report, and vice versa. Accordingly, it is considered appropriate to consider the responses to the consultation on the local plan alongside those on the published environmental reports themselves.
- 5.2. This section summarises the consultation processes which have been undertaken and how they have influenced the plan and the SA/SEA. A fuller explanation of the consultation and preparation process in relation to the Local Plan is contained within the Statement of Consultation published in June 2013 under the Local Plan regulations.

“Pre – plan” engagement.

- 5.3. While not formally part of the local plan process, the Council carried out a range of informal engagement with the public, local organisations and other interested parties in the years 2008 – 2010, before the preparation of the Issues and Options Report. These included workshops with the public, with developer interests and with town and parish councils. The outcomes of these events helped to identify some of the key sustainability issues which were raised within the Issues and Options Report, and then which influenced the environmental report considerations and the objectives and contents of the local plan. For example, issues raised included the need for affordable housing and employment opportunities, the need to protect the local environment (including open spaces and the countryside) and the need for local health and other facilities. There was general support for urban concentration of development as a strategy. The process included ongoing engagement with the statutory consultees who were also both part of and engaged in the external panel which considered the preparation of the Strategic Housing Land Availability Assessment (SHLAA), considering the broad suitability and deliverability of housing sites. The SHLAA site assessments considered environmental information which was later used as the basis for SA/SEA site assessments.

Scoping Report

- 5.4. The Council prepared a draft scoping report for the SA/SEA in 2009, to allow comments to be made on the proposed methodology. Consultation took place between 29th May and 6th July 2009. Comments were received from Natural England, English Heritage, Environment Agency, Torbay Council and Devon Primary Care Trust. These comments are summarised in Annex 5 of the October 2012 environmental report with an initial response from the Local Planning Authority. A revised Scoping report was prepared, making changes to the methodology to improve the clarity and readability of the process. Alterations were

made to the approach in order to provide an easier to understand and use framework for assessment, reducing the objectives from 18 to 9 objectives, which provide equal coverage to the environmental, social and economic facets of sustainable development.

- 5.5. The following bullet points indicate the other key changes which arose from this consultation.
- Additional environmental data on important biodiversity networks considered, such as Greater Horseshoe Bat radio tracking data.
 - Additional information on local and national biodiversity sites;
 - Reference to need for enhancement to landscape and biodiversity;
 - Waste hierarchy referred to;
 - A single objective comprehensively covering the Built Environment and consideration of potential social and economic secondary benefits;
 - Amend the “neutral” score to 0;
 - The monitoring includes measurable indicators.

Issues and Alternative Options

- 5.6. In June 2010, the Council consulted on the above document, alongside which was published a Sustainability Assessment Review Note. The review note provided a high level review of the sustainability issues related to the proposals in the consultation document. It considered the potential implications of the options presented in the Issues and Alternative Options Report, and its contents were reflected in that report. Comments received on the consultation documents were taken into account in the preparation of the Preferred Options Report. The Council prepared a report showing how the comments received at this stage were considered further in the preparation of the local plan. Of particular relevance to the environmental report are the following points;

- Consideration of the individual character and needs of each town to form part of the approach to the plan, reflected in the SEA work;
- Incorporation of additional sustainability issues such as local food production, provision for specific groups within the population, rural economy and infrastructure needs;
- Incorporation of policies on resilience and carbon reduction within the plan forming significant elements of policy mitigation and integrating environmental issues;
- Incorporating flood risk as a key sustainability issue, so that it is considered as a key constraint in land allocations and appropriate policies are included in the plan;
- Policies and proposals on the delivery of green infrastructure, providing environmental mitigation to be reflected in the environmental report;

- The importance of the undeveloped coast, which was given greater weight in the NPPF, led to specific policies in the local plan and was taken into account within the environmental report;
- The importance of transport to sustainability appraisal was reflected in the environmental reports, particularly in relation to carbon emissions and climate change;
- Considerations of design were included in the local plan, and reflected in the environmental report accompanying it;
- The sustainability implications of different levels of homebuilding were considered in the environmental report, and the outcomes reflected in the local plan;
- The commuting/travel and other environmental implications of economic development and job growth were considered further in the local plan and sustainability report, taking account of the variety of opinions expressed;
- The distribution of development (particularly housing) set out in the issues and options report formed a key element of the alternative distributions assessed in the environmental report. The preferences expressed were not conclusive at that stage, however the following comments were considered further as part of the input to the environmental reports; the need for infrastructure; transport implications; environmental capacities and the need for mitigation; important landscape areas; consideration of provision at a new settlement.
- Other suggestions were carried forward into the plan and assessed in the environmental report including the need for strategic breaks between certain settlements.

Preferred Options

- 5.7. In January 2012 the Council published the Preferred Options Core Strategy 2013 – 2033 for consultation. There was substantial feedback on the Preferred Options Core Strategy with 5,442 individuals and 173 organisations making 16,737 separate comments. The Council prepared a long report detailing the comments made, which can be found on the website at www.teignbridge.gov.uk/planteignbridgeconsultation which page also links to copies of the comments received in full.
- 5.8. There is a “You Said, We Did – Changes Arising” document, also published on the council’s website, which shows how the main issues raised were taken into account. The key environmental/sustainability issues raised during this consultation considered are set out in the following paragraphs and led to changes in the local plan reflected in the SA/SEA report. The following key changes were made between the preferred options and proposed submission local plan.

Housing provision

- 5.9. There was considerable public opposition to the level of housing proposed within the Preferred Options report, which had been based on the 2010 update of the Strategic Housing Market Assessment (the originally 2007 version of the report

was prepared jointly with other councils in the Exeter/Torbay). The Council agreed to commission a further review of this report, and the 2012 SHMA indicated a reduced housing need. This new evidence was considered in the SA/SEA report, against the background of the newly published final National Planning Policy Framework. The SA/SEA concluded that the revised SHMA advice, 620 dwellings per year, was the appropriate provision of housing for the local plan, taking account of housing need and other environmental/social/economic impacts, and this was the level included in the local plan. This was a reduction from the 740 per year consulted on at Issues and Options and Preferred Options stages.

Locations for growth

5.10. The comments made on the sites suggested within the preferred options consultation were considered and, where valid in planning terms, guided the assessment of the sites and then the decision – making on which sites to allocate. Additional sites suggested were assessed within the SA/SEA report and, where appropriate, allocated. Some of the key changes were:

- Deletion of strategic sites west of Teignmouth; these sites were acknowledged to have significant environmental impact, particularly in relation to landscape and biodiversity. They were also of concern in relation to viability. The overall reduction in housing need included within the plan allowed these sites to be reconsidered, in the context of a slight shift in the strategic distribution between towns, although maintaining the overall urban concentration approach which was considered to be the most sustainable general strategy.
- Reduction in scale of sites west and south of Newton Abbot; specific further surveys were undertaken of the allocated sites to provide improved understanding of the potential impact on Greater Horseshoe Bats, associated with the European protected South Hams SAC. This additional information influenced the SA/SEA contents, and also the contents of the required Habitat Regulations Assessment. Further consideration of these and of the reduced overall need for housing led to a reduction in the scale of development at sites NA1, NA2 and NA3 adjoining Newton Abbot.
- Reduced scale and removal of housing at Milber, Newton Abbot; landscape impact and heritage implications raised during the consultation were reconsidered, leading to a reduction in the scale of this proposal and its alteration to be employment – related only.
- Amended proposal at Penns Mount, Kingsteignton; further consideration was given to the landscape impact of this proposal, and additional undeveloped green infrastructure was incorporated.
- Land at Bradley Bends, Bovey Tracey was deleted from the local plan; consideration was given to the views of residents who expressed environmental and other concerns about this proposal. However, the site received planning permission on appeal before the hearings into the local plan and therefore a revised policy was reinstated as a main modification.

- Land proposed as a school site at Chudleigh was removed, reflecting comments made at the public consultation, and due to lack of proven need.

Greater landscape protection.

- 5.11. Additional policies were included to define the Area of Great Landscape Value, and the Undeveloped Coast was formally defined on the policies map. The SA/SEA reflected these changes and the additional natural environment protection as a result.

Biodiversity.

- 5.12. Working closely with Natural England, additional work and discussion was undertaken to ensure that there was no likely impact on the highest quality biodiversity sites in or close to the plan area – specifically the European wildlife sites. This work, which concentrated on the specific and separate legal requirement of the Habitat Regulations Assessment, was used to incorporate appropriate mitigation measures where necessary. Further work led to a number of minor modifications to the plan being submitted with the plan to clarify further these requirements.

Greenfield land

- 5.13. The reduction in housing provision between the two plan versions led to a reduction in the amount of Greenfield/agricultural land to be developed, with relative benefits in terms of the “resource use” factor. With limited potential for allocations on previously developed land being available, no further mitigation for this was proposed in the plan, and the factor is the only one forecast to show a negative impact within the SA/SEA. Note that former minerals land is rarely “previously developed land” because it is usually subject to requirements to reinstate to Greenfield status.

Proposed Submission Local Plan

- 5.14. The proposed submission plan was published for formal representations in October 2012, taking account of a number of key environmental issues raised in the consultation, including those outlined above. The plan was accompanied by the SA/SEA report (also dated October 2012) with both available for comment. The level of response to the local plan was significantly lower than the preferred options report. 594 individuals and organisations commented, raising a total of 1827 representations on the policies, the SA/SEA report and the draft Habitat Regulations Assessment.
- 5.15. The main issues raised were similar to those previously raised, including the overall level of development, its distribution, impact on the natural environment and traffic and transport implications. English Heritage and the Environment Agency did not make any objections at this stage. Arising from comments by Natural England in particular, further work on the Habitat Regulations Assessment was carried out before the submission, leading to a series of clarifications on the mitigation and other measures necessary to ensure that no likely harm was caused

to the European wildlife sites. Natural England signed off the final Habitat Regulations Assessment before the plan was submitted. Their concerns were largely mitigated by minor changes to the plan's wording, mainly to provide greater clarity on the protection of the European wildlife sites in the area, also allowing them to withdraw a significant number of their detailed objections to the contents of the plan.

5.16. A number of comments were made on the SA/SEA report itself during the consultation as follows:

- Shutterton Park stated that the policies in the plan (particularly relating to allocations on and close to land they were promoting, i.e. policies DA1, DA2 and other Dawlish policies) were contrary to the findings of the SA/SEA. They questioned the robustness of the process following amendments to the plan at full council, contrary to the advice of officers. They considered that the reasons for considering different alternative strategies and the reasons for selecting the approach in the local plan were not explicit and that the decision in relation to their land and adjoining land was therefore not rational. A more detailed review of the SA/SEA was included in their formal representations.
- Pat Day stated that the sustainability appraisal of land at Indio House, policy BT2A indicated a number of environmental concerns which should have led to the site not being allocated in the submitted plan.
- Hallbaron Ltd confirmed their understanding of the SA/SEA conclusion in relation to their allocated site TE3 as a large Greenfield site with benefits in terms of provision of new homes and limited impact on the natural environment.

5.17. Taking account of these comments and of those on the proposed submission local plan, the council prepared an Addendum to the SA/SEA which set out further clarity, signposting the relevant assessments and evidence that informed the progressing stages of plan making. It highlighted key evidence used in the preparation of the plan, summarising some of the key points arising. It included a list of published documents and a link to the relevant council webpage. The document was submitted to the Inspector with the local plan and placed on the council's website with the other "core documents".

5.18. The Council submitted the Local Plan with the October 2012 and June 2013 SA/SEA report and addendum, the Habitat Regulations assessment and a large volume of associated evidence on environmental, social and economic issues, for example;

- Strategic Housing Land Availability Assessment
- Site screening for Greater Horseshoe Bats
- Supplementary Report on Greater Horseshoe Bats
- Various reports relating to the protection of the Exe Estuary SPA and Dawlish Warren SAC
- Air Quality Action Plan
- Water Cycle Study

- Green Infrastructure Studies and Strategies
- Rapid Health Impact Assessments
- Landscape Character Assessment

5.19. The Inspector held hearings into the Local Plan, in accordance with the requirements of the Planning Act, covering the key strategic issues, at which any objector to the local plan could attend and speak. The hearings were held over 11 days. One of his specific questions for consideration at the hearing was “Is the Local Plan based on a sound process of sustainability appraisal and testing of reasonable alternatives in a proportionate manner?” Objectors to the local plan were invited to prepare papers setting out their concerns and the October 2012 report and the June 2013 Addendum to the report were discussed at the relevant hearing session. A number of further concerns were expressed in relation to the SA/SEA.

5.20. Following the hearing sessions the Council prepared a note for the planning inspector, to advise him that there was a need for further work on the contents of the SA/SEA to reflect the discussions on that matter at the hearing. The Council would therefore prepare a further addendum, to be consulted upon alongside the Inspector’s proposed main modifications, and which would also reflect the proposed main modifications.

Inspector’s Main Modifications

5.21. In December 2013, the Inspector provided the Council with his proposed main modifications, and the Council considered them in the further addendum, which also provided more discussion and detail on a range of issues, including;

- Signposting and organisation of the report.
- Implications of appeal and application decisions during 2013;
- Strategic options and reasons for choices in the local plan;
- Cumulative, synergistic and secondary effects.

5.22. The further addendum was published for comment alongside the proposed main modifications prepared by the Planning Inspector, to ensure the soundness of the local plan.

5.23. The comments on the addendum were published on the council website, and, together with the comments on the proposed main modifications, provided to the planning inspector for his consideration. The Council also provided an errata sheet to the inspector which made some minor amendments, including dealing with some criticisms made during that consultation. This was also published on the council’s website. The Inspector confirmed in his report that he considered the contents of the SA/SEA reports/addenda from October 2012, June 2013 and December 2013 and related comments.

5.24. The comments received on the December 2013 Report are summarised in the table below together with a response which was reported to the Council meeting at which the local plan was adopted, including one from English Heritage which was received late.

Respondent	Summary of comments	TDC Response
DARE	Possible that data used in the documents are not appropriate or up to date. Reference to housing at Dawlish being more than 1,250 as stated	The addendum updates and discusses the housing data in relation to Dawlish (see paragraphs 5.8.38 – 5.8.39).
Abbotskers well PC, Mr Boxall	<p>failed to comply with the necessary legislation in the SEA process to produce a Local Plan which can be found to be ‘sound’: the omission to consult with the Public at the correct time and the failure of TDC to carry out, or include, the necessary environmental research and collation in sufficient depth for each of the individual areas when determining the baseline environmental data and then to consider subsequent effects on the environment likely to be caused by development.</p> <p>The assessment is missing a section on ‘ <i>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.</i>’</p> <p>The documentation produced by TDC as its SEA, is overwhelmingly biased towards ‘<i>External objectives</i>’, the second type of objectives and not those directly concerned with environmental matters, the third set of objectives to ‘<i>test the environmental effects of the plan.....</i>’.</p> <p>The TDC’s approach to meet the requirements of the Directive does not go to a sufficient depth when collecting, examining or comparing environmental data to enable proper comparisons to be made when deciding which individual area should be excluded or included in the plan.</p> <p>The content in Chapter 4 of the ‘Further addendum’ December 2013 does not deal in any depth at all with</p>	<p>The requirements for the preparation of SA/SEA have been complied with, including consultation. The October 2012 report was published alongside the Local Plan and open to comments during the consultation period. Indeed, comments on it were received. The June 2013 addendum was a summary of the preparation history of the SA/SEA, and was published in advance of the hearing sessions, at which the SA/SEA was discussed. Accordingly, we consider that there has been sufficient consultation on the SA/SEA in accordance with the legal requirements.</p> <p>The Planning Inspector has confirmed that the legal requirements for the preparation of Sustainability Appraisal (which incorporates SEA) were complied with and that the Local Plan is sound.</p> <p>The further addendum contains Section 5.9 which sets out the measures contained within the plan which prevent, reduce and as fully as possible to offset significant adverse effects. However, it is accepted that this was not signposted in table 2, p 15 or in the non-technical summary. This can be rectified with a drafting amendment.</p> <p>The directives and the regulations require that the assessment consider the effects on the environment, such as biodiversity, population, human health.. etc. There is no requirement that environment be limited to, or concentrated on “natural environment”. The parallel requirement for Sustainability Appraisal requires that an appropriate range of sustainability issues are considered.</p>

Respondent	Summary of comments	TDC Response
	<p>the secondary and cumulative effects of the areas within the plan but is limited to the 'Cross border' aspects. Therefore not in accordance with the requirements of the Guidance. This is particularly evident when considering Area NA3 and the adjacent SSSI.</p> <p>A clear lack of understanding of the importance to consider and comply with the requirements of the Directive in respect to the question of monitoring the effects on the environment.</p>	<p>The assessment criteria A – I cover the issues required by the SEA regulations (see the October 2012 SA/SEA report p19).</p> <p>The information related to specific potential sites is sufficient to come to a conclusion in relation to the most appropriate areas for development, including that contained in the Appendices to the October 2012 report.</p> <p>Secondary, Cumulative and Synergistic effects are considered in the discussions on strategy options (for example, under Natural Environment, p79), policy considerations (for example, paragraph 5.5.20) and within the discussion on site allocations (for example paragraph 5.8.25). These are in addition to the trans -boundary considerations within chapter 4. These discussions are signposted within table 2, p16.</p> <p>The monitoring proposals within the SEA are appropriate to measure the “significant environmental effects”.</p>
<p>Mr Jope</p>	<p>Paragraph 5.5.44 Is the allocation of 3ha new employment land necessary? The Inspector for the SPL planning appeal thinks not. Improving Dawlish Business Park could be sufficient.</p> <p>Paragraph 5.5.98 Amend paragraph 5.5.98 of the SA/SEA to acknowledge the need to comply with Government policy (NPPF and maintaining a 5 year supply of housing land) without appearing to endorse (support and agree with) that policy.</p> <p>Paragraph 5.5.99 Extra jobs created will be taken up by newly arising residents in new development and will not increase job prospects for the existing population. Therefore</p>	<p>The views expressed are mainly opinions on the planning merits of the plan's changes, rather than comments on the SA/SEA itself.</p> <p>The various statements referred to as “false” are matters of planning opinion, to which the objector takes a different view.</p>

Respondent	Summary of comments	TDC Response
	<p>housing growth will not create higher levels of employment. Delete this paragraph as it is a false one.</p> <p>Paragraph 5.8.44 DA2 North West of Secmaton Lane The scale of development will have a landscape impact, contrary to what the statement says. The statement is misleading and compromises the objectivity of the SA/SEA. DA2 and the SPL site represent a 50% increase in ha size compared to the Preferred Options. Remove sentence on landscape impact or reword to state “There is some potential impact on biodiversity...”</p> <p>Paragraph 5.8.45 Includes false information justifying the increase in the size of DA2. Questions the Council’s assertion that a reduction in the number of homes at DA2 would affect the viability of this allocation when:</p> <p>The allocation of 350 homes at DA2 in the Preferred Options was viable (this also needed the link road)</p> <p>There is uncertainty between TDC and DCC that a 7 metre wide link road is actually needed</p> <p>DA2 is not needed to improve the accessibility of existing residential areas (which are already accessible)</p> <p>Either validate the statements in 5.8.45 or delete them.</p>	
<p>Exeter Estates</p>	<p>In relation to SWE2, the importance of creating jobs should not be underestimated in the assessment.</p> <p>Landscaping can reduce the impact of development and should therefore balance the issue of environmental impact against employment generation.</p>	<p>The comments express a different view on appropriate scoring of the site, and therefore relate to an alternative planning judgement. The assessment has been reconsidered and appears appropriate.</p>

Respondent	Summary of comments	TDC Response
	<p>5.7.15-16 Takes issue with the description and suggests that the text in the FASA should be replaced by 'no significant impact from this change on the strategy or the overall impact of the Plan'.</p> <p>Table 14 – KS2 scoring for the policy. Suggest alternative scoring.</p>	
Torbay Council	No comments to make	No comment
Mr Weekes	<p>P55 – challenges allocation of land for DA7 as not available and therefore the policy and mitigation cannot be delivered. Makes comparison to SWE3 proximity to development. Also references the landowner not benefiting from development in the area.</p> <p>P59 – refers to Natural England comment about certainty of funding for HRA related mitigation. Links this to the Coastal Park and lack of certainty due to unwilling landowner. Also references the landowner not benefiting from development in the area unlike SWE developments.</p> <p>5.5.177 – objects to, what is suggested to be, inference that TDC own the land.</p> <p>5.5.178 – considers that alternative options should be subjected to public scrutiny and that Natural England should comment on the alternative locations.</p> <p>General query about TDC's approach to identifying the site, as opposed to the principle, particularly given the distance of DA7 from the allocations at DA1/DA2.</p> <p>5.9.2 Objectives – refers to DA7 not being deliverable, loss of Grade 1 and 2 agricultural land, therefore assessments of A Natural Environment and D Resource Use</p>	The comments appear to relate to the DA7 proposal from a local plan perspective rather than in relation to the SA/SEA. The Inspector has not amended the approach to DA7 contained within the local plan.

Respondent	Summary of comments	TDC Response
	<p>are inaccurate.</p> <p>9.3 – No mitigation if DA7 not delivered, as no alternative provided for.</p>	
Mr Shantry	<p>The FA clearly does not fully meet the Directive as set out in my submission. Therefore the Local Plan should be re-examined or found Unsound until full and complete compliance is made by TDC to the Directive. The latest ONS population growth forecasts (as set out in clause 159 NPPF) must replace the preposterous baseline population figures invented by TDC and used in the creation of the Local Plan with subsequent exaggerated impacts on jobs, homes and infrastructure.</p> <p>Furthermore I request that this submission be the basis for the Inspector to reconsider his decision of accepting 12,400 homes and instead allocate 9,500 (plus 500 new allocations post examination) as the preferred sustainable number with the Wolborough NA3 allocation being deleted.</p>	<p>The responses to the Abbotskerswell/Crowd comments cover the issues relating to the SA/SEA procedure raised here. A number of issues are suggested to be “missing” from the Addendum, but they are covered in the document, or within the earlier October 2012 report. For example, “no inclusion or explanation of these significant effects” whereas the FA and the original report cover these in detail. Further, “no detail of mitigation measures in the FA” whereas these are covered in Chapters 3,4 and 5 of the further Addendum. Suggestions of insufficient detail are noted, but this is not agreed, and the level of detail provided is proportionate to the issues raised by particular sites and proposals. The other comments mainly relate to disagreements about the local plan proposals themselves such as level of housing, strategy and specific allocations on which the Inspector has come to his conclusion already.</p>
Coombesend Road Residents Assoc	<p>Objects to the analysis in relation to policies or paragraphs that directly or indirectly relate to policies KS2 and KS7 of the Local Plan.</p> <p>5.6.9 Request a text change to say ‘no reduction in employment land provision’. Justification given is that over 4ha will not be for employment due to land take of strategic infrastructure, park and ride, and freight transfer.</p>	<p>Using existing car parks as a basis, we estimate about 350 car parking spaces per hectare, sufficient for a “modest” park and change site. The Freight transfer depot would count as employment provision, being within use class B8.</p> <p>It is noted that the site to which the CRRA objects has been deleted by a main modification.</p>
Cockwood Residents Assoc	<p>Consider that the SA/SEA appraisal for Dawlish should refer to 13% of the overall plan total for housing, not 10%, and therefore the appraisal is not appropriate and should be reviewed.</p>	<p>The discussion on Dawlish housing provision in paragraphs 5.8.38 – 5.8.39 is considered to be appropriate in the context of changing circumstances, and further changes do not appear to be warranted.</p>

Respondent	Summary of comments	TDC Response
	Several points relating to Shutterton Brook, contamination, rain fall, traffic and the coastal park are offered.	Comments on DA7 relate to the local plan proposals, rather than the SEA itself.
Broadhempston Residents Assoc	Makes a specific comment about a site listed within the appendices and that the addendum supports the preservation of Devon villages from over development.	No comment.
English Heritage	Concerned that the appraisal does not adequately cover the heritage implications of extending site NA1 for employment at Forches Cross.	The SA appraisal refers to the potential archaeological remains in the NA1 site already, and therefore there is no significant additional implication arising from the Forches Cross extension. Visual impact on the Stover historic park and garden can be mitigated by appropriate design, layout and landscaping.

5.25. The errata are as follows:

Page	Para / Section	Errata
8	2.3.8	4 th sentence amended to 'Instead, the sites were all...'
11	2.4.1	Final sentence amended to 'replaces the description in the October...'
16	Table 2	Insert a new section between the 'likely significant effects' and 'outline of reasons for alternatives' boxes entitled ' The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme '. Alongside the title insert the following text: A detailed assessment of the measures to prevent, reduce and offset the significant adverse effects on the environment of implementing the Local Plan are set out on page 43 of the October 2012 report and pages 160-166 of the December 2013 report.
18	3.1.1	First sentence amend text to 'October 2012 report. It should be read alongside and Appendices...'
30	3.9.1	First sentence delete second 'informed'
72	5.2.2	Add wording: 'of these, as compared against the 'no plan' scenario explained on pages 11-14 of this report are set out in the table below Table 5 '
75	5.3.2	Add wording: in the table Table 6 below as compared against the 'no plan' scenario explained on pages 11-14 of this report, (any...'
77	5.4.3	First line, add 'the October 2012 report considered...'
101	5.5.35	Second sentence 'S16 policies also...'
120	5.5.145	First line, insert 'policy is likely to have localised...'
121	5.5.154	First sentence replace first 'protected' with ' protection '

Page	Para / Section	Errata
127	5.5.194	Third line replace 'nesting' with ' roosting '
137	5.8.10	Second line replace 'Ogwell' with ' Abbotskerswell '
140	5.8.25	Third line replace 'above' with ' on page 129 '
145	5.8.44	Fifteenth line amend to 'discussion in paragraph × 5.8.43).'.
145	5.8.45	End of first sentence, fourth line refers to S3. It should be S4 .
151	5.8.70	Fourth and fifth line, amend to 'strategic requirements set out in the paragraph × for the town , but ...'
152	5.8.80	End of first sentence, amend to 'referred to in paragraph × 5.8.70).'.
156	5.8.100	Fifth line, amend to 'referred to in paragraph × 5.8.94 have set...'
157	5.8.107	Sixth line 'with the adjoining stream...'
158	5.8.112	End of sentence amend 'set out earlier at p??? on pages 114 – 115, paragraphs 5.5.12 – 5.5.13. '
159	5.8.116	Location should be ' Lamacraft ', not 'Lamacroft'.
160	5.8.121	Eighth line change 'with the rest most of the village...';
162	C Climate Change	First line of final paragraph on page 162, add 'housing are further mitigated through...'
181 - 199	Titles within the section	All 'SA Requirement' renamed as ' SEA Requirement '
181	8.2.4	Insert between bullets 6 and 7 ' 7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment to implementing the plan or programme '.
181	8.2.4	Renumber bullets 7, 8 and 9 as 8, 9 and 10 .
183	Above 8.2.11	Delete 'SA Requirement'
185	Above 8.2.21	Underline ' SEA Requirement 4. '
190	8.2.38	Second sentence 'The Local Plan has not been appraised...'
190	8.2.38	Final sentence 'scenario described above in the December 2013 report. '
191	8.2.45	Second sentence 'the contents of pages 56-74 of this the December 2013 report. '
191	8.2.46	Tenth line 'Instead, the sites were all...'
194	B Built Environment	Final line 'chapter 5 of this the December 2013 report. '
198	Below table	Insert ' SEA Requirement 7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme '. Alongside the title insert the following text:
198	Below table	Add new paragraphs 8.2.52a A detailed assessment of the measures to prevent, reduce and offset the significant adverse effects on the environment of implementing the Local Plan are set out on page 43 of the October 2012 report and pages 160-166 of the December 2013 report.

Page	Para / Section	Errata
		8.2.52b To prevent significant adverse impacts on the environment the Plan avoided allocations or proposals on or within the most environmentally sensitive areas. To reduce significant adverse impacts on the environment the policies and proposals within the Plan include requirements for mitigation measures, such as buffers, sustainable urban drainage systems, green infrastructure or enhancement of existing habitats. The growth strategy is to focus most development at existing towns which have significant infrastructure and population, and also to reduce development in open countryside and reduce the need to travel longer distances for work, education, and social and cultural activities. To off-set significant adverse impacts the Plan includes policies which allow for biodiversity off-setting, Suitable Alternative Natural Green Spaces and off-site provision of facilities.
199	Above 8.2.53	Amend to ' <u>SEA Requirement 7 8-</u> '
200	Above 8.2.59	Amend to ' <u>SEA Requirement 8 9-</u> '
200	8.2.59	Second line, amend 'set out on pages × 186-187 of this report.'
206	A Natural Environment	Amend score to -2?
207	G Housing	Amend score to +1?
207	I Infrastructure	Amend score to ?
211	Appendix	Amend to Appendix B C

Adoption

5.26. The Local Plan was considered at a meeting of the full Council on 6th May 2014. Councillors were provided with a copy of the Inspector's Report, a list of recommended minor modifications and a summary of the comments received on the December 2013 SA/SEA Report. Councillors debated the environmental and other implications of adopting the local plan, particularly in comparison with the "no-plan" implications in relation to the impact on appeals and infrastructure provision. They resolved to adopt the local plan with those main and minor modifications.

Summary of changes

5.27. From this section it can be seen that the consultation on the local plan and the SA/SEA documents led to a number of changes. The key ones are summarised below.

5.28. Changes to the SA/SEA objectives used for assessment were made, arising from comments received on the scoping report. Examples include reference to enhancement, consideration of biodiversity networks and reference to the waste hierarchy. These changes were also reflected in the local plan. At the same time, the number of objectives was reduced from 18 to 9, which improved the readability

and utility of the assessments, and made it an easier to use tool for comparison and assessment.

- 5.29. The comments on the proposed submission SA/SEA were considered and led to the preparation of an addendum (June 2013) providing additional information on the history of the SA/SEA work and the local plan preparation. This addendum was published and submitted to the Local Plan inspector with the local plan.
- 5.30. Further comments at the local plan hearings led the council to prepare a further addendum revisiting a number of issues and providing additional detail as necessary. The addendum updated a number of the October 2012 report sections. The addendum was subject to consultation alongside the proposed main modifications to the local plan. The comments received on the addendum during the relevant time period were provided to the planning inspector, who considered them in his final report. An errata list was prepared to take account of some of those comments, and is published within this report.
- 5.31. Changes to the contents of the local plan were also made during the process, arising from consultation responses.
- 5.32. The overall 20 year housing provision was reduced from the initial 14,800 suggested in the Issues and Options Report and the Preferred Options document to 12,400 in the adopted local plan. This reflected concerns over the impact of the level of development on various environmental issues, leading to an objective re-assessment of the level of housing need. The revised assessment was reflected in the SA/SEA report which accompanied the plan submission, and the subsequent addendum. The Inspector supported this level of development.
- 5.33. A number of sites were deleted and a number of others reduced in scale from the local plan, reflecting this reduced housing need and consultation responses on the plan. The SA/SEA reflected and assessed these changes against other reasonable alternatives. The Inspector made further changes, mainly in relation to employment sites, which were further assessed in the SA/SEA further addendum. However, the overall strategy remained intact, reflecting the role of the SA/SEA work which indicated it was the most appropriate one.
- 5.34. Alterations to a number of the environmental policies were made through the process, including reintroducing Areas of Great Landscape Value, further definition of Undeveloped Coast and Strategic Open Breaks and changes to various policy wordings to clarify and improve the protection of various key environmental assets, particularly European wildlife sites.

6 How the results of any consultation with other member states have been taken into account.

- 6.1. Where a plan is likely to have significant effects on the environment of another Member State (i.e. another country within the EU) then the Secretary of State should be informed, and may commence discussions with that other Member State. However, the Teignbridge Local Plan is highly unlikely to have any such effects, and therefore there is nothing to report under this heading.

7 The reasons for choosing the plan as adopted, in light of other reasonable alternatives dealt with

Introduction

- 7.1. The alternative options initially considered are the reasonable ones because they were realistic in terms of achieving the needs of the Local Plan, the area and national guidance. The options chosen were also considered to provide the opportunity of achieving reasonable progress against the 9 sustainability objectives within the October 2012 report, striking an appropriate balance between social, economic and environmental considerations, and being reasonably different to allow a thorough assessment of alternatives.

Approach to Assessment

- 7.2. At each stage of the Local Plan process there were opportunities to test the robustness and appropriateness of the approach taken. Through the October 2012 report work to date and on reflection in this statement it is considered that the reasonable alternative options have been tested.
- 7.3. A full explanation of the reasons for selecting the reasonable alternatives considered is contained within pages 17 - 39 of the December 2013 report. The main areas covered included the appropriate level of evidence based need to plan for new homes, jobs and shops, including how much and where.
- 7.4. The assessment of the overall impact of the Local Plan is built up from a number of considerations, as follows:
- Key elements of the overall strategy;
 - Housing growth
 - Employment growth
 - Distribution of development
 - Strategic policies
 - General policies contained within the plan;
 - Development proposals (allocations) contained within the plan; and
 - Interactive (secondary, cumulative and synergistic) effects of the above.
- 7.5. The approach to assessment was to consider the alternative strategies and policy wordings against the “no plan” scenario, using the following descriptors and the SEA objectives described earlier.
- 7.6. For each assessment, the sustainability criteria are assessed using a scale, ranging from +3 to -3, and allowing for an indication of uncertainty. It should be noted that these are not numbers to be summed, but represent descriptors of the forecast impacts of the policy against each sustainability objective, using the following scale:

- +3 have a significant and overriding positive impact in contributing towards the achievement of the objective
- +2 have a major net positive impact in contributing towards the achievement of the objective
- +1 have a minor net positive impact in contributing towards the achievement of the objective
- 0 have no positive or negative impact in contributing towards the achievement of the objective – or – have some positive and some negative impacts thus the overall balance is neutral
- 1 have a minor net negative impact in contributing towards the achievement of the objective
- 2 have a major net negative impact in contributing towards the achievement of the objective
- 3 have a significant and overriding negative impact in contributing towards the achievement of the objective
- ? it is not possible to predict the impact of the proposal on achievement of the objective or the impact indicated has a high degree of uncertainty

- 7.7. Each of these descriptors represents a range of potential impacts, and therefore if two proposals both have the same indicator, there may still be a disparity of impact between the two, although this may not be a large difference.
- 7.8. The assessments take account of interactive effects and the impact of mitigation strategies which are or could be associated with a policy or allocation. These factors are taken into account when considering the most appropriate approach to include within the Local Plan.
- 7.9. A description of any difficulties encountered in making the assessments is contained within pages 167-168 of the December report. This included: limited data availability particularly for wildlife and species; updates to evidence such as housing need; new national guidance produced during plan preparation such as the National Planning Policy Framework; uncertain impacts from developments outside the scope of the plan, such as the South Devon Link Road; limited spatial scale of data, such as some information only being available at a district wide level which includes part of Dartmoor National Park.
- 7.10. The following paragraphs set out an outline of the reasons for selecting the key strategic approaches within the Local Plan, and the

Housing Growth

- 7.11. The level of housing growth is based on the Council's objective assessment of housing need. This conforms with the national guidance within the National Planning Policy Framework. There were no significant environmental concerns which would lead to a reduction in this rate of growth. Significantly higher rates of growth had increasing impact on various environmental factors and therefore were not supported. The Inspector supported the level of housing growth proposed in

the Local Plan. He considered that the Strategic Housing Market Assessment (2012 update) provides a proper basis for the identification of objectively assessed housing need, and that the amount of growth proposed would not have unduly adverse impacts on the landscape and ecology of the district.

Employment growth

- 7.12. The plan strategy was based on the option which sought to most closely match the provision of employment with the resident workforce. This had the potential to significantly reduce travel for commuting purposes, improve local health and wellbeing, while keeping environmental impacts at an acceptable level. A reduced level of provision would have reduced the benefits, but would not have resulted in significant environmental gains. Conversely, aiming for a higher rate of employment growth, even if achievable, would have increased the local environmental disbenefits and may have increased commuting by encouraging a net in-commuting economy in the longer term. The Inspector supported this approach.

Distribution of development

- 7.13. The strategy indicated a concentration of development at the towns, and particularly at the Heart of Teignbridge, plus an urban extension at Exeter. Other distribution options had different advantages and disadvantages, but the plan's strategy fared well in relation to a range of environmental benefits. The Inspector supported the strategy, stating that, compared with other patterns of more dispersed development, it would accord with the fundamental planning objective to promote sustainable development, protecting the most valuable landscapes and other environmental assets and help to reduce travel by car.

Policy wordings

- 7.14. Each of the policies was assessed against the criteria, considering the alternative possibilities suggested during consultation. Further detail, including the consideration of cumulative, synergistic and secondary effects, is contained in the December 2013 report, p95 onwards. The Local Plan Inspector recommended changes to two policy wordings and one paragraph of the supporting justification, to bring them into line with the National Planning Policy Framework, but otherwise did not make any further changes. He recommended the following modifications, for reasons given in his report:

MM2; requirement to update leisure and retail study.

MM3; modify EN3 to refer to viability.

MM13; modify policy wording EC6.

- 7.15. The minor modifications make some further changes, but without having a significant effect on the SA/SEA considerations.

Specific Allocations

- 7.16. Each potential allocation was assessed against the SA/SEA criteria, and this assessment was used to guide decisions about the most appropriate allocations, within the strategic level and distribution of development considerations. The December 2013 Report contains a discussion of the reasons for choosing the sites allocated, compared with the other reasonable alternatives, taking account of the criteria and other related planning matters.
- 7.17. Additional potential allocations were considered by the Planning Inspector during the hearing. In the event, the changes made to the allocations by the Inspector's main modifications were relatively minor, and mostly related to employment provision rather than housing. The modifications were:
- MM1; extension of NA1 to incorporate additional employment land.
 - MM4; delete DA1 and extend DA2 to incorporate additional employment land.
 - MM5; extend site DA5.
 - MM6; add policy BT2 for permitted housing.
 - MM7; delete site BT2B.
 - MM8; alterations to site CH2.
 - MM9; delete site KS2.
 - MM10; delete site KS7.
 - MM11 amend policy wording for SWE1.
- 7.18. The Inspector gave specific reasons for these main modifications in his report. The December 2013 Report considered the SA/SEA implications of these (when they were proposed main modifications), which the Inspector took into account. The SA/SEA was further reviewed following the receipt of the inspector's report and no further work was required.

8. The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan

- 8.1. The SEA Directive requires that monitoring measures are set out within the Adoption Statement.
- 8.2. The SEA regulations require that the significant environmental effects of the plan or programme are measured. The following indicators are suggested as the basis for measuring the Local Plan Significant Environmental Effects (unless indicated otherwise, they relate to the plan area). These are linked to the nine sustainability objectives as set out below. The indicators include a note of the main body responsible for measuring/monitoring these changes. They are as set out in the environmental report. It is open to the council to further refine or add to these measures, as the implementation of the plan progresses.
 - Natural Environment
 - Condition of SSSI units. (Natural England)
 - Changes to total area of County Wildlife Sites (Teignbridge District Council)
 - Built Environment
 - Building for Life Scores of new housing developments (Teignbridge District Council)
 - Number of Conservation Area Appraisals and Management Plans (Teignbridge District Council)
 - Climate Change
 - Per capita carbon emissions in Teignbridge (DECC)
 - Developments permitted contrary to Environment Agency advice (Environment Agency/Teignbridge District Council)
 - Resource Use
 - Proportion of dwellings on previously developed land (Teignbridge District Council)
 - Air Quality monitoring (Teignbridge District Council)
 - Economy
 - Area of land developed for employment uses (Teignbridge District Council)
 - Area of land with permission for employment uses (Teignbridge District Council)
 - Town Centres
 - Town centre pedestrian activity (Teignbridge District Council)

- Square metres of retail floorspace completed within a town centre (Teignbridge District Council)
 - Housing
 - Number of new homes built (Teignbridge District Council)
 - Number of new affordable homes built (Teignbridge District Council)
 - Health
 - Average male and female life expectancy in Teignbridge District (Public Health Observatories)
 - Number of reported crimes in Teignbridge District (Neighbourhood Statistics)
 - Infrastructure
 - New infrastructure provided in the plan area (Teignbridge District Council)
- 8.3. In his report the Inspector noted the monitoring measures proposed. The Authority Monitoring Report (AMR) will contain the monitoring information set out above, when available, plus additional information as necessary and available. This will allow the authority to consider the need to review policies and proposals within the local plan, take additional actions or invest resources differently. The AMR is placed on the Council's website. There is a stated commitment to review the local plan every 5 years, involving further Sustainability Appraisal and Strategic Environmental Assessment. The Council will be in a position to review infrastructure planning and the use of Community Infrastructure Levy in the shorter term.
- 8.4. Over the course of time there will be changes in national planning policy and practice guidance; those changes may themselves require the establishment of new data gathering initiatives and review mechanisms.

8 Conclusion

- 9.1. The SA/SEA process has ensured that environmental and sustainability issues have been considered and integrated into the Teignbridge Local Plan 2013 – 2033, taking account of comments received. The Inspector who considered the Local Plan took account of the SA/SEA in his recommendations.