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Please ask for: Local Plans team

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Date: 22 September 2026

Dear Sir/Madam,

Exeter City Council response to the Torbay Local Plan - Regulation 19

Exeter City Council (the City Council) welcomes the opportunity to respond to Torbay Council's consultation on the Draft Torbay Local Plan (Regulation 19).

This response follows the letter the City Council provided in January 2026 to the previous Regulation 18 Local Plan consultation and reiterates the position on the important issue of meeting housing needs.

The City Council notes the Draft Plan's proposed housing requirement of an average of 400 homes per year as set out in Strategic Policy HS. This is seen in the context of an annual local housing need of approximately 970 per year. Over the course of the twenty-year plan, these figures would result in a housing requirement of 8,000 homes against a local housing need of 19,400. This is a deficit of 11,400. The topic paper covering Spatial Strategy and Justification for Proposed Growth Level explains the capacity issues which lead to these significant levels of unmet need.

The Draft Plan indicates that Torbay's unmet housing need is a sub-regional matter that needs to be resolved in cooperation with wider Devon Authorities through the Spatial Development Strategy. This would appear to be a reasonable approach in the medium term. However, this will need to be supported by an appropriate evidence base relating to housing need and housing capacity. It may also require a review of functional geographies covering housing market areas, functional economic market areas and travel to work areas.

It should be noted that the proposals for local government reorganisation, and the establishment of the larger Torbay and South Devon Council, would also provide the opportunity for Torbay's local housing need to be met in the local area as part of the new Council's housing requirement as will presumably be set out in a future local plan for the new Council. It is however noted that local government reorganisation has currently been paused.

More recently, significant discussions have been held between the City Council and Torbay Council to support the preparation of the Exeter Plan (the emerging Local Plan) which is currently at examination, and which has progressed through its hearings. A statement of common ground between the two councils was agreed in 2025. This agreed the following:

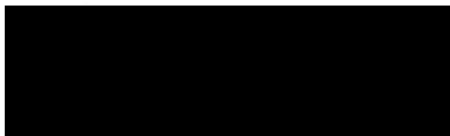
- That Exeter, East Devon, Mid Devon and Teignbridge broadly function as one housing market area;
- That Torbay broadly functions as a separate housing market area;
- That Exeter is meeting its own housing needs; and
- That Exeter cannot accommodate any of Torbay's unmet local housing need due to capacity constraints in the city administrative area.

Furthermore, Exeter does not share a boundary with Torbay; the city is located approximately 20km to Torbay's northeast which demonstrates the limited relationship between the city and Torbay in terms of housing needs.

Further discussions will be required relating to housing and other development needs, together with other strategic issues, to inform the emerging Spatial Development Strategy, ongoing plan-making at District Council level but also as required for the local plans of new unitary authorities as they are established by local government reorganisation, albeit subject to the current review process.

If you have any questions please do not hesitate in contacting me.

Yours faithfully,



Ian Collinson

Strategic Director for Place