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**Date:** 29 January 2026

Dear Sir/Madam,

**Exeter City Council response to the Torbay Local Plan Regulation 18 (November 2025) Consultation**

Exeter City Council ('the City Council') welcomes the opportunity to respond to Torbay Council's consultation on the Draft Torbay Local Plan (Regulation 18), as part of the wider cooperation on strategic planning and local plan-making in the respective local authorities.

The City Council notes the Draft Plan's proposed housing requirement of 400 homes per year as set out in Strategic Policy HS, and the resultant shortfall against Torbay's standard method local housing need figure of approximately 950 homes per year. The Draft Plan does not indicate how Torbay's unmet housing need is proposed to be accommodated in the sub-region, and paragraph 3.1 of the consultation document states that the justification for the housing shortfall will be set out in a supporting topic paper at a later date.

In relation to Torbay's unmet housing need arising from the Draft Plan's proposed housing requirement, the City Council wishes to restate the position set out in the signed [Statement of Common Ground between the City Council and Torbay Council](#), which forms part of the evidence base for the Exeter Plan. The Exeter Plan is currently undergoing examination by the Planning Inspectorate and hearing sessions will commence on Tuesday 3 March 2026.

The City Council considers that Torbay and Exeter comprise separate functional housing market areas. This approach is agreed within the Statement of Common Ground and is consistent with [Torbay's Housing and Economic Needs Assessment \(Chapter 3: The housing baseline\)](#) which forms part of the evidence base for the Draft Torbay Local Plan.

Exeter City Council is a constrained urban authority facing housing delivery constraints as described in Appendix B of the Statement of Common Ground. Policy H1 of the Exeter Plan identifies sufficient sources of supply to meet Exeter's local housing need. Exeter City Council is unable to additionally accommodate any of Torbay Council's local housing need due to capacity constraints in the city administrative area. The Statement of Common

Ground states agreement between the City Council and Torbay Council that Exeter cannot accommodate any of Torbay's unmet housing need.

Yours faithfully,

A handwritten signature in blue ink that reads "Ian Collinson". The signature is written in a cursive style with a large, sweeping initial "I".

Ian Collinson

**Strategic Director for Place**