



**Exeter**  
City Council

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**[www.exeter.gov.uk](http://www.exeter.gov.uk)**

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**Date: 28 November 2022**

Sent by email to: [future.planning@torbay.gov.uk](mailto:future.planning@torbay.gov.uk)

Dear Sir/Madam

**RE: Torbay Local Plan - Regulation 18: Site Options Consultation**

Thank you for the opportunity to comment on the second Regulation 18 consultation document for the Torbay Local Plan. This letter will be formally considered following the end of the consultation by the City Council's Executive meeting in January 2023.

This response follows on from the letter provided by the City Council to the previous Regulation 18 consultation held earlier this year.

In response to that consultation, the City Council underlined support for the regeneration and brownfield objectives of the Torbay Local Plan and acknowledged the environmental challenges in the Bay. Indeed, Exeter faces similar issues and is proactively pursuing a spatial strategy to fully meet housing needs whilst protecting environmental assets and maximising brownfield development.

The previous consultation set out a series of growth options which considered the level of housing to be accommodated in Torbay. The City Council raised concerns at that stage about the options which would only partially meet housing needs. However, the current consultation proposes that provision is made for only half of the housing requirement identified by Government; 300 homes per year in contrast to a housing requirement of 600 homes. Over the course of the plan period, this equates to a deficit of 5,400 homes.

During the previous consultation, the City Council identified a lack of evidence to support an approach which does not fully meet housing requirements. Although the housing and economic need assessment and housing and employment land availability assessment are made available now, a more comprehensive evidence base would maximise local housing delivery and enable a more robust conclusion to be determined regarding development capacity.

If it is not possible for local housing needs to be met in Torbay in full, there will be significant implications for the wider area where there are existing and significant housing requirements, constraints and delivery challenges associated with meeting local needs.

Looking specifically at Exeter, the potential in the period to 2040 to accommodate any additional housing beyond Exeter's requirement is extremely limited given that we are already maximising regeneration sites to accommodate around 85% of additional housing in the Exeter Plan on brownfield allocations. These sites are extremely challenging to bring forward. A significant evidence base has been put together to support this approach in Exeter.

I hope these comments are helpful in progressing the Torbay Local Plan. If you have any questions please do not hesitate in contacting me.

Yours faithfully,

A handwritten signature in blue ink that reads "Ian Collinson". The signature is written in a cursive, flowing style.

**Ian Collinson**

**Director of City Development**