



The Exeter Plan 2021-41 Regulation 19 Publication Plan

From Pickhaver, David [REDACTED]
Date Wed 05/02/2025 17:46
To Planning Policy <Planning.Policy@exeter.gov.uk>
Cc George Marshall [REDACTED]; Craig Davies [REDACTED];
Luscombe, Adam [REDACTED]; Edmondson, David
[REDACTED]

Dear George and Team

Congratulations on getting you Regulation 19 Local Plan out for consultation. That's a big achievement, so well done.

Please excuse emailing a response rather than filling in a Commonplace comment. Both of these ask about the Plan's legal compliance and soundness. I do not wish at this stage to challenge the Plan's legal compliance or soundness. However, I do need to reiterate the view that I have expressed in previous representations that Torbay is unlikely to be able to meet its Local Housing Need as laid down by the revised Standard Method published in December 2024. This is an officer level view at this stage, but founded on evidence such as the Housing and Economic Land Availability assessment and other evidence base work.

We need to assess how the revised method of basing housing need upon housing stock rather than household projections affects the assessment of need on a larger than local basis. However, the Government has clearly acknowledged the need to plan beyond individual council's boundaries. In the case of Devon the key driver of population growth is domestic migration, which is likely to be a cross-boundary or city-region wide matter. It is important that it is considered by the Housing Market Areas adjoining Torbay. Exeter is, of course, part of the Greater Exeter HMA.

The Presumption in Favour of Sustainable Development at Plan making (NPPF 11 a)-b), and the "positively prepared" test of soundness (at 36a) both require that unmet housing needs from neighbourhood areas should be accommodated where it is practical to do so and consistent with sustainable development. Paragraphs 24-28 of the Framework have expanded on the need to maintain effective cooperation with neighbours, under the Duty to Cooperate.

As far as I can see, the only reference to Torbay is at 9.2 in relation to the Devon and Torbay Local Transport Plan. Whilst this reference is welcome, it is not related to cross-boundary housing and other development need issues. This issue needs to be addressed in Section 6 and /or Policy H1 of the Local Plan or in accompanying documentation. Please can we maintain an ongoing discussion under the Duty to Cooperate on this matter, with a view to agreeing a Statement of Common Ground. In the meantime, I must ask that the above be taken as a representation made to the Plan at Regulation 19 Stage, and we reserve our right to appear at the Examination. I am sure that these issues can be resolved under ongoing discussions.

Thank you
Kind regards
David

TORBAY COUNCIL

David Pickhaver | Principal Policy and Project Planner,
Strategy and Project Management | Spatial Planning

2nd Floor North, Tor Hill House, Torquay TQ2 5QW

[REDACTED] | [REDACTED]

www.torbay.gov.uk

[Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Instagram](#)

This electronic email is confidential and may also be privileged. If you are not the intended recipient, please notify the sender, and please delete the message from your system immediately. The views in this message are personal; they are not necessarily those of Torbay Council.