

Exeter Plan

Statement of Common Ground

Exeter City Council and Torbay Council

July 2025

Exeter City Council
Civic Centre
Paris Street
Exeter
EX1 1JN



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1. Introduction

- 1.1. Exeter City Council (the City Council) has been preparing the Exeter Plan since late 2020. The plan has progressed through four public consultations, culminating in the Regulation 19 publication in December 2024.
- 1.2. Following the end of the publication process in February 2025 representations have been compiled and attention has turned to addressing the issues raised in the representations.
- 1.3. Torbay Council provided a representation or comment to the Regulation 19 Plan. This is considered through this Statement of Common Ground.
- 1.4. This Statement of Common Ground demonstrates that the City Council and Torbay Council have cooperated on strategic matters and that the plan is positively prepared and effective – two of the tests of soundness for plan preparation as identified by paragraph of the National Planning Policy Framework¹. The document assists in presenting evidence that plans are deliverable over the plan period and based on effective joint working across local authority boundaries. It is also part of the evidence required to demonstrate compliance with the Duty to Cooperate.
- 1.5. This Statement of Common Ground has been prepared in accordance with the plan-making section of the Planning Practice Guidance² and meets the requirements of the Planning and Compulsory Purchase Act 2004³ and the Localism Act 2011⁴. It demonstrates that there has been a proportionate and legally required level of cooperation between the Authorities.
- 1.6. The detailed comments from Torbay Council are considered in Exeter Plan chapter order in this Statement of Common Ground. However, as an over-arching comment, the Council representation states that they ‘...do not wish at this stage to challenge the Plan’s legal compliance or soundness’.

¹ The Exeter Plan is being prepared under the December 2023 version of the NPPF. Available here:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Available at: <https://www.gov.uk/guidance/plan-making>

³ Available at: <https://www.legislation.gov.uk/ukpga/2004/5/section/13>

⁴ Available at: <https://www.legislation.gov.uk/ukpga/2011/20/section/110>

2. Strategic matters: Spatial strategy

Broad summary of chapter content

- 2.1. The spatial chapter of the plan sets the tone for the plan as a whole and in doing so sets out the main principles for guiding the pattern and form of development in the city.
- 2.2. The spatial strategy chapter includes two policies:
 - S1: Spatial strategy; and
 - S2: Liveable Exeter Principles.
- 2.3. Policy S1 includes the new spatial strategy for Exeter. The spatial strategy guides the pattern and characteristics of development in the city and the proposed development sites included in the Exeter Plan. A key strand of the new spatial strategy is to steer the majority of development to brownfield sites in order to protect the city's landscape and retain Exeter's environmental and heritage quality.
- 2.4. Policy S2 includes the Liveable Exeter principles. These set out the requirements for the standard of development that the City Council will expect for all large-scale brownfield developments. Liveable Exeter is a growth and place-making initiative governed by seven principles which have been drawn from Exeter's Vision 2040. In adopting the Liveable Exeter principles, we aim to strengthen and reinvigorate existing communities and repurpose and transform other parts of the city through high quality development.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 2.5. No representations were raised by Torbay Council regarding the spatial strategy at Regulation 19 Publication stage.

3. Strategic matters: Climate change

Broad summary of chapter content

- 3.1 We are facing huge environmental challenges caused by human interventions which are increasing carbon dioxide and other greenhouse gas emissions. In recognition of this, the City Council has declared a climate emergency and pledged to work towards creating a net zero carbon city by 2030. The Exeter Plan includes policies and proposals that contribute to meeting this challenging ambition and to making the most of the opportunities of a net zero carbon city, whilst adapting to the unavoidable impacts of climate change.
- 3.2 The climate change chapter includes nine policies which will support the move to a net zero city:
- CC1: Net zero Exeter;
 - CC2: Renewable and low carbon energy;
 - CC3: Local energy networks;
 - CC4: Ground-mounted photovoltaic arrays;
 - CC5: Future development standards;
 - CC6: Embodied carbon;
 - CC7: Development that is adaptive and resilient to climate change;
 - CC8: Flood risk; and
 - CC9: Water quantity and quality.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 3.3 No representations were raised by Torbay Council regarding climate change at Regulation 19 Publication stage.

4. Strategic matters: Homes

Broad summary of chapter content

- 4.1. Housing is a significant issue nationally and for Exeter. The Exeter Plan will meet the housing need for the city within the administrative boundary of Exeter City. It will also help to address the shortage of affordable homes in the city and provide the good quality accommodation we all need. Young adults, families, older people, those with disabilities, essential local workers, care leavers, students and Gypsies and Travellers all have specific housing needs which we need to meet.
- 4.2. The housing chapter includes sixteen policies which will help to address housing needs in the city:
- H1: Housing requirement;
 - H2: Housing allocations and windfalls;
 - H3: Regeneration opportunity areas;
 - H4: Affordable housing;
 - H5: Build to rent;
 - H6: Co-living housing;
 - H7: Custom and self-build housing;
 - H8: Homes for older people;
 - H9: Supported housing;
 - H10: Purpose built student accommodation;
 - H11: Gypsy and traveller accommodation;
 - H12: Residential conversions and houses in multiple occupation;
 - H13: Loss of residential accommodation;
 - H14: Accessible homes;
 - H15: Housing density and size mix; and
 - H16: Residential amenity and healthy homes.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 4.3. Paragraph 61 of the December 2023 National Planning Policy Framework (NPPF) (the version of the NPPF under which the Exeter Plan will be examined) requires that strategic policies for meeting an area's local housing need should be informed by a local housing needs assessment conducted using the standard method. In addition to the local housing need figures, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- 4.4. The City Council and the adjoining local authorities of East Devon, Mid Devon and Teignbridge District Councils broadly function as one housing market area – the Exeter Housing Market Area (HMA). Torbay Council broadly functions as a separate housing market area – the Torbay HMA. The Torbay HMA adjoins the Exeter HMA (with Teignbridge District Council lying between the City Council and Torbay Council). The Torbay HMA also adjoins the Plymouth HMA.
- 4.5. The City Council has worked with Torbay Council since the outset of plan-making to discuss and resolve cross-boundary issues relating to the meeting of local housing needs. This has included a series of Duty to Cooperate meetings. Through those meetings, and in its response to the Exeter Plan Regulation 19 consultation, Torbay Council has formally notified the City Council that it is unlikely to be able to accommodate all its housing need within its own boundaries and this may have an impact on sub-regional plan-preparation. Torbay Council has similarly notified the other local authorities within the Exeter and Plymouth HMAs. At the time of writing this statement, Torbay Council has not specified how many homes Torbay can accommodate or how any deficit should be considered across the sub-region. Torbay Council has indicated that it will be able to indicate a provisional figure in Autumn 2025, but notes that the division of this among neighbouring authorities would ideally entail a level of sub-regional planning. Torbay's response to the Regulation 19 consultation is provided in the table below.
- 4.6. Since the Regulation 19 consultation, further Duty to Cooperate discussions have been held between the City Council and Torbay Council. As a result of those discussions, the City Council and Torbay Council agree that:
- The Exeter Plan is sound and legally compliant;
 - The Exeter Plan is seeking to meet the entirety of Exeter's housing requirement;
 - However, there is insufficient suitable, available and achievable land within the Exeter to accommodate any of Torbay Council's unmet local housing need; and
 - A minor modification to the Exeter Plan should be suggested, explaining the cross-boundary context to Exeter's housing requirement and the local housing needs of neighbouring areas.

- 4.7 This agreement has been reached in the context of the statement at appendix B of this document. The suggested plan modification is set out in the table below.

Issue	Element of the plan	Organisation's representation	ECC comment	Organisation's comment	Final position and suggested plan modification
Homes	Chapter 6 / Policy H1: Housing requirement	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	In light of the post-Regulation 19 Statement by ECC contained at appendix B to this document, Torbay Council and ECC agree that Exeter cannot accommodate any of Torbay's unmet housing needs. ECC also agrees with Torbay Council that it would be helpful for the Exeter Plan to include additional supporting text explaining the cross-boundary / sub-regional context of housing needs as they relate to the city.	Torbay Council notes that Exeter City Council is a highly constrained urban area with significant flooding, Heritage and other infrastructure constraints. It has a substantial student population. Whilst Torbay is unable to meet its Local Housing Need as measured by the Standard Method; it acknowledges Exeter City Council's constrained boundaries and the likelihood that development in the City will likely be needed to address Exeter's own LHN.	It is suggested that the following new paragraph (6.8) is added to the supporting text of policy H1 to provide the cross-boundary / sub-regional context to Exeter's housing requirement, including with reference to meeting any un-met local housing need of other local authorities: 6.8 When setting a local housing requirement, the NPPF requires local authorities to take into account any unmet housing needs of neighbouring areas. The City Council and East Devon, Mid Devon and Teignbridge District Councils broadly operate as one Housing Market Area (the Exeter HMA), with Torbay comprising a separate HMA, albeit with

		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			some functional links with the Exeter HMA. Through Duty to Cooperate discussions, it has been agreed that East Devon, Mid Devon and Teignbridge District Councils do not require Exeter to accommodate any of their local housing needs. Torbay Council agrees that Exeter cannot accommodate any of its unmet local housing need due to capacity constraints in the city administrative area.
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		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.			
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5. Strategic matters: Economy and jobs

Broad summary of chapter content

- 5.1 Exeter is at the heart of a large functional economic market area which reflects a significant travel to work area. The Exeter Plan needs to support the economy and green growth by identifying the employment space and infrastructure we need. This will help to increase prosperity and wellbeing.
- 5.2 The economy and jobs chapter includes six policies which will help to address the economic and employment needs of the city:
- EJ1: Economic growth;
 - EJ2: Retention of employment land;
 - EJ3: New forms of employment provision;
 - EJ4: Access to jobs and skills;
 - EJ5: Provision of local services in employment areas; and
 - EJ6: New transformational employment allocations.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 5.3 No representations were raised by Torbay Council regarding economy and jobs at Regulation 19 Publication stage. Torbay Council has acknowledged Exeter's role as a key driver of economic growth in the Sub Region but has not commented specifically upon its Economy and Jobs policies.

6. Strategic matters: Retail and the future of our centres

Broad summary of chapter content

- 6.1 The function of the city, local and district centres is changing. Retail is likely to be just one part of their future; a greater variety of uses need to be included in the centres to widen their attractiveness and appeal. Great care will need to be taken to protect the city centre from competition from out of centre retail to ensure its ongoing health.
- 6.2 The retail and future of our centres policy includes two policies which will help to address the future challenges facing our centres:
- RFC1: The future of our centres; and
 - RFC2: Development in, and affecting, within our centres.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 6.3 No representations were raised by Torbay Council regarding retail and the future of our centres at Regulation 19 Publication stage.

7. Strategic matters: Sustainable transport and communications

Broad summary of chapter content

- 7.1 The way we travel will be vital to the success of Exeter. It will be central to achieving net zero carbon, growing prosperity, healthy lifestyles and making improvements to our natural and historic environments. In future, travel will not just be about whether we walk or drive, digital communications will also be vital. The Exeter Plan will help to ensure that the city is resilient to changes in travel, supporting innovative development in the right places, providing real options and promoting fresh approaches to transport.
- 7.2 The sustainable transport and communications chapter of the Exeter Plan includes nine policies which will help to inform evolving transport and communications in the city:
- STC1: Sustainable movement;
 - STC2: The transport hierarchy;
 - STC3: Supporting active travel;
 - STC4: Supporting public transport;
 - STC5: Supporting more sustainable forms of car use;
 - STC6: Travel plans;
 - STC7: Safeguarding transport infrastructure;
 - STC8: Motorway service area; and
 - STC9: Digital communications.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 7.3 No representations were raised by Torbay Council regarding sustainable transport and communications at Regulation 19 Publication stage. Torbay Council has elsewhere acknowledged the importance of improving transport links and especially sustainable transport links between Torbay and Exeter, but does not regard this as an issue of contention between the Authorities.

8. Strategic matters: Natural environment

Broad summary of chapter content

- 8.1. Exeter has a high quality natural environment, with Valley Parks and city parks, water bodies including the River Exe and the Exeter Ship Canal and many public rights of way. The hills surrounding the city give Exeter a distinctive landscape setting, whilst the city contains a rich variety of wildlife habitats. The Exeter Plan will be a key tool to accommodating appropriate development to meet the city's needs whilst protecting key natural environmental assets.
- 8.2. The natural environment chapter of the Exeter Plan includes seven policies which will help to accommodate development in a way which protects and enhances the natural environment:
- NE1: Landscape setting areas;
 - NE2: Valley Parks;
 - NE3: Biodiversity;
 - NE4: Green infrastructure;
 - NE5: Green circle;
 - NE6: Urban greening factor; and
 - NE7: Urban tree canopy cover.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 8.3 No representations were raised by Torbay Council regarding the natural environment at Regulation 19 Publication stage.

9. Strategic matters: History and heritage

Broad summary of chapter content

- 9.1 Exeter's rich historic environment makes the city unique and continues to shape the city's culture and identity today. New development can raise challenges for our historic environment but the Exeter Plan provides an opportunity to conserve and enhance Exeter's heritage assets whilst exploring cultural links and celebrating the contribution of heritage to the character of the city.
- 9.2 The history and heritage chapter of the Exeter Plan includes five policies which will help to accommodate development in a way which protects and enhances the historic environment:
- HH1: Conserving and enhancing heritage assets;
 - HH2: Conservation areas;
 - HH3: Archaeology;
 - HH4: Heritage assets and climate change; and
 - HH5: Conserving and enhancing Exeter City Walls.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 9.3 No representations were raised by Torbay Council regarding history and heritage at Regulation 19 Publication stage.

10. Strategic matters: Culture and tourism

Broad summary of chapter content

- 10.1. Exeter is a historic but modern city whose compact size and location means it offers a great balance between urban and rural life. Enhancing Exeter's cultural offering will be key to future success, building the sense of place and belonging in the city. Exeter is committed to being a healthy and active city with culture embedded as standard to enable people to live fulfilled lives. This will help to promote Exeter as a city of culture and further drive the identity and attraction of the city. The Exeter Plan seeks to protect existing culture and identity whilst supporting development to play its part in enhancing cultural provision.
- 10.2. The culture and tourism chapter of the Exeter Plan includes two policies which seek to explore, enhance and celebrate the cultural richness of the city and its profile as a prominent tourist destination whilst specifying the role for development:
- C1: Protecting and enhancing cultural and tourism facilities; and
 - C2: Development and cultural provision.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 10.3 No representations were raised by Torbay Council regarding culture and tourism at Regulation 19 Publication stage. Torbay Council regard the tourism offers of the two areas to be different but complementary.

11. Strategic matters: High quality places and design

Broad summary of chapter content

- 11.1. The quality of the places in which we live and work and that we visit is fundamental for so many reasons, including to support our health and wellbeing, attract investment, generate pride in our city and help achieve our net zero ambitions. Development offers opportunities to create high quality places that respond to Exeter's distinct characteristics, reflect local culture and the historic environment, provide appropriate green space and integrate with existing communities, promoting social cohesion and healthy lifestyles.
- 11.2. The high quality places and design chapter of the Exeter Plan includes three policies which seek to deliver the development we need in high quality, liveable, connected places:
- D1: Design principles;
 - D2: Designing-out crime; and
 - D3: Advertisements.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 11.3 No representations were raised by Torbay Council regarding high quality places and design at Regulation 19 Publication stage.

12. Strategic matters: Health and wellbeing

Broad summary of chapter content

- 12.1. The Exeter Plan will play a part in improving health and wellbeing by providing high quality housing, supporting job creation, enabling increases in physical activity, supporting active travel, enhancing nature, supporting improvements in air quality and supporting the delivery of the health infrastructure we need.
- 12.2. The health and wellbeing chapter of the Exeter Plan includes two policies which promote inclusive development which supports communities in becoming healthier and more active:
- HW1: Health and wellbeing; and
 - HW2: Environmental quality, pollution and contaminated land.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 12.3 No representations were raised by Torbay Council regarding health and wellbeing at Regulation 19 Publication stage.

13. Strategic matters: Infrastructure and facilities

Broad summary of chapter content

- 13.1. The Exeter Plan is vital in identifying the infrastructure that we need, ensuring it is provided in the right way, at the right time and in the right place. Working with key infrastructure partners will be essential to ensure that infrastructure needs can be met in this way. The City Council will continue discussions relating to cross-boundary infrastructure provision in the context of the development planned in Exeter but also close to the city in East Devon and Teignbridge and also Mid Devon.
- 13.2. The infrastructure and facilities chapter of the Exeter Plan includes five policies which will support the provision of appropriate infrastructure, address development viability and support the provision of community facilities, open space, play areas, allotments and sport:
- IF1: Delivery of infrastructure;
 - IF2: Viability;
 - IF3: Community facilities;
 - IF4: Open space, play areas, allotments and sport; and
 - IF5: New cemetery provision.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 13.3 No representations were raised by Torbay Council regarding infrastructure and facilities at Regulation 19 Publication stage.

14. Site allocations

Broad summary of chapter content

- 14.1 The Exeter Plan allocates a series of sites for development. The site allocations (included in Policies H2 and EJ6) have been selected in accordance with the spatial strategy for the city set out in Policy S1.
- 14.2 The majority of site allocation development will take place on five strategic mixed use brownfield sites that are located close to the city centre or key public transport hubs. The sites are identified in Policy H2 and were part of the original Liveable Exeter work.
- 14.3 Thirty-three sites are allocated for predominantly residential or residential development in Policy H2. These make up the balance of our housing requirement and provide for choice and competition in the market. The majority of the sites are brownfield in line with the spatial strategy. Some of the sites are greenfield, these sites helping to provide a mix of development opportunities to enable housing delivery throughout the Plan period.
- 14.4 Three employment sites are allocated in Policy EJ6. These sites will help play an important role in meeting employment needs and supporting the growth of the city.

Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 14.5 No representations were raised by Torbay Council regarding site allocations at Regulation 19 Publication stage.

15. Sustainability Appraisal and Habitats Regulation Assessment

Explanation of the SA and HRA

- 15.1 To accompany the Exeter Plan, SA and HRA have been undertaken at various stages of the plan-preparation process.
- 15.2 SA and HRA reports were provided for consultation alongside the Publication Regulation 19 draft of the Exeter Plan. Representors were able to provide representations on both these documents.

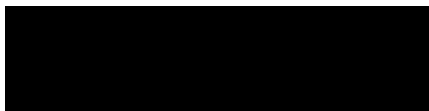
Addressing the response of Torbay Council to the Regulation 19 Exeter Plan

- 15.3 No representations were provided by Torbay Council regarding the Sustainability Appraisal and Habitat Regulations Assessment at Publication state.

16. Governance, review and signoff

- 16.1 The parties agree that this statement is an accurate representation of matters discussed and issues agreed upon, or where there are areas of disagreement, this statement documents the issue, and that both parties confirm their respective position.
- 16.2 It is agreed that these discussions will inform the Examination of the Exeter Plan (the local plan). Both parties will continue to work collaboratively to meet the Duty to Cooperate obligations and will both continue to work proactively on the key strategic cross boundary issues identified in this document.

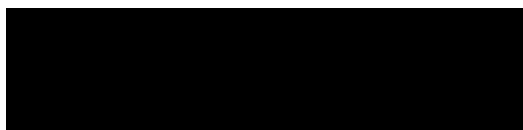
Signed:



Name: Roger Clotworthy

Position: Service Lead, City Development, Exeter City Council

Signed:



Name: David Edmondson

Position: Divisional Director, Planning, Housing, Transport and Climate Emergency, Torbay Council

Appendix A: ECC and Torbay Council: Strategic matters summary matrix

Strategic matters	Agreement (Y) or outstanding issues (at time of submission) (X)
Spatial strategy	Y
Climate change	Y
Homes	Y
Economy and jobs	Y
Retail and the future of our centres	Y
Sustainable transport and communications	Y
Natural environment	Y
History and heritage	Y
Culture and tourism	Y
High quality places and design	Y
Health and wellbeing	Y
Infrastructure and facilities	Y
Site allocations	Y

Appendix B: Statement of Exeter's housing delivery constraints

Policy H1 of the Exeter Plan identifies sufficient sources of supply to meet Exeter's local housing need (including some headroom). However, Exeter is unable to additionally accommodate any of Torbay Council's local housing need for the following reasons:

- There is very limited capacity for additional development on the edge of Exeter – development already extends to the administrative boundary on the eastern, northeastern, northwestern and southwestern edges of the city. The vast majority of remaining greenfield land located between the urban boundary and the City Council's administrative boundary is designated as Valley Park and/or landscape setting. It is unsuitable for residential development;
- Of sites within the urban boundary that are assessed in the Exeter Housing and Economic Land Availability Assessment as suitable, available and achievable for housing development:
 - The majority are proposed as housing allocations in the Exeter Plan;
 - Two large areas - the northern part of Marsh Barton and North Gate – are identified as regeneration opportunity areas. However, due to development constraints (including flood risk and heritage), limited site promotion and multiple landownerships, the developability of these areas is currently uncertain. As such, the Exeter Plan does not rely on these areas to meet any of Exeter's housing need and they cannot be relied upon to meet any of Torbay's unmet housing needs;
 - The remaining sites are either:
 - Proposed in the Exeter Plan as employment allocations to meet Exeter's economic development needs. As such, they are unavailable to meet any of Torbay's unmet housing needs; or
 - Are constrained by factors such as flood risk, heritage and existing land-uses (e.g. community facilities, public open space, public car parking), to the extent that deliverability/developability for housing is currently uncertain. Whilst some of these sites may help to meet Exeter's housing needs via the windfall allowance made in policy H1, they cannot be relied upon to meet any of Torbay's unmet housing need. These are all matters for which footnote 7 of the 2023 NPPF provides a clear reason for restricting development, or the adverse impacts of development would significantly and demonstrably outweigh the benefits when assessed against the policies in the framework taken as a whole.