

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 4 (Site Allocations Process and Methodology)

Prepared by Savills on behalf of Morgan Real Estate (respondent reference number: C-25)



Issue 1 – Site Allocation Methodology

Q1 How were different sites considered for inclusion as allocations? What process did the Council follow in deciding which sites to allocate?

1. Site options for allocation include submissions from call for sites exercises and those previously listed in the Exeter Core Strategy and Local Plan First Review. The Sustainability Appraisal evaluated each site, including East Gate, against sustainability criteria. Based on Exeter City Council's assessment of potential impacts, sites were either proposed or removed as detailed in Appendix E of the appraisal.
2. Morgan Real Estate strongly supports the East Gate allocation being retained through this process, as it reflects the highly sustainable nature of the site and supports the delivery of vital dwellings through the Local Plan process.

Q2 How did the Council consider the viability and deliverability of sites, especially where new strategic infrastructure is required or where viability has proven challenging, such as on brownfield land?

3. Morgan Real Estate's focus in responding to this question is the process by which viability and delivery was tested for Strategic Policy SBA2, East Gate. It is positive that viability on the site was tested specifically, as set out in the 'Local plan viability assessment addendum' (August 2025), and that the testing accounted for a variety of schemes coming forward across the allocation including standard apartments, co-living, and purpose-built student accommodation. Indeed, the assessment goes on to say that the Council is proposing a modification to the plan to increase the capacity of the site from 609 units to 691 units, which would improve the viability of the allocation. This has been carried forward into the Schedule of Suggested Modifications under SMM11, which suggests that Policy H2 be reworded to the capacity for East Gate as 691. Our previous Regulation 19 representations requested that the scale of development within East Gate be increased to 700 homes, so this proposed modification is welcome as increasing the capacity will help to ensure flexibility and viability. We do however consider the increase to 691 homes should be reflected in both policies H2 and SBA2.

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4. It is also positive that the viability assessment acknowledges the need for alternative tenures such as purpose build student accommodation when considering the viability of the allocation, and Morgan Real Estate strongly support suggested modification SAMM113 which would insert the following wording into the policy: “includes a range of housing types (for example homes for families, older people and students”.
 5. However, Morgan Real Estate consider that sufficient flexibility should be baked into the wording of the site allocation policy in the event that viability issues arise at a later date. It should be acknowledged that such an outcome is possible given the nature of brownfield redevelopment, and that all of the requirements of the allocation should be subject to viability.

Q4 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

6. In so far as it relates to the selection of East Gate, Morgan Real Estate find the site selection process to be robust.

Q5 In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

7. As per Question 2, we strongly support wording which acknowledges the delivery of purpose built student accommodation as part of the allocation.