

# Exeter Local Plan: Examination in Public

## Hearing Statement – Matter 9 (Site Allocations)

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

The Savills logo, consisting of the word "savills" in a lowercase, sans-serif font, with the 's' in a darker shade than the rest of the word. It is positioned in the top right corner of the page.

### Issue 1 – Housing Allocations and Windfalls – Policy H2

#### **Q1 Do the proposed residential site allocations incorporate all types of housing? What is the latest position regarding planning approvals and construction timeframes for these sites?**

1. As drafted, Policy SBA2 does not incorporate all types of housing. In our previous representations, we emphasised that other types of housing such as co-living and purpose built student accommodation should be included in the allocation as they are often crucial in unlocking the viability of centrally located brownfield sites.
2. We therefore welcome the suggested modification SAMM113 which suggests the policy text be amended to read:

*'The site provides an opportunity to redevelop the area for a range of housing types (for example, homes for families, older people and students)....'*

#### **Q4 Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account? How were issues such as flood risk considered?**

3. In so far as it relates to the selection of East Gate, Morgan Real Estate find the site selection process to be robust. The East Gate allocation is in a highly sustainable location in the city centre able to accommodate circa 700 dwellings, which will contribute greatly towards meeting Exeter's unmet housing needs.

#### **Q5 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 sites like Water Lane? What differentiates Water Lane from Marsh Barton which was removed as a housing allocation to instead be a Regeneration Opportunity Area?**

4. 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 account for a

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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.

5. 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”*.
6. However, Morgan Real Estate would strongly suggest that sufficient flexibility is baked into the wording of the allocation 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.

### **Q8 What is the justification for the suggested modifications to the supporting text to Policy H2? Why are they necessary for soundness?**

7. The suggested modification for Policy H2 to increase the capacity of East Gate from 600 to 691 dwellings (ref: SMM11) is necessary to ensure flexibility and increase the viability of the site, per the Viability Assessment Addendum. Increasing the number of allocated dwellings is also necessary to ensure that the plan is being prepared positively to meet not just the minimum but also the future housing need. Morgan Real Estate would however strongly recommend that both Policy H2 and Policy SBA2 are amended to state that the capacity of the site is 700 dwellings, as set out in our Regulation 19 representations, to ensure flexibility and viability.

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### **Q5 Is it realistic to expect self-build and custom-build homes to come forward at the densities proposed on each of the sites?**

8. As stated in our response to Question 4, Issue 3, Matter 7, it is not realistic to expect self-build and custom-build homes to come forward at the densities proposed for the East Gate site. There exists a fundamental conflict between allocating self-build plots and advancing higher density brownfield development in and around the city centre, which underpins the spatial strategy. Most sites situated centrally, such as East Gate, are unlikely to be suitable for self-build plots. City centre developments will largely require flatted solutions to achieve appropriate densities and optimise land usage, rendering self-build plots on these sites impractical.
9. Although the Exeter Local Housing Need Assessment 2024 provides evidence of demand for self-build housing, this alone does not warrant implementing a universal policy requiring 5% self-build plots on sites with 20 or more dwellings. Self-build provisions should be based on specific locational demand (which appears not to be captured by the Exeter City self-build register) and assessed for feasibility according to individual schemes.

### **Q6 Are Policies SBA1 to SBA5 sufficiently flexible for them to be effective?**

10. Policy SBA2 should be worded to allow for additional types of housing to be provided on the site, such as purpose built student accommodation, as per the suggested modifications set out by the Council. It should also reflect that the requirements set out are subject to viability.
11. Whilst we welcome the proposed modifications set out in the Schedule of suggested modifications, including the increase in the scale of development, reference to a range of house types and inclusion of a hotel, we do continue to maintain, as set out in our Regulation 19 representations, that Policy SBA2 should include some of the potential uses as 'potential for' rather than an absolute requirement. For example, the 'potential for' retail and commercial units and the 'potential for' contributions to early years and school provision and GP provision. Reference should be made to our Regulation 19 representations for further details.

### Policy SBA2 – East Gate

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**Q1** According to Policy SBA2 the proposed housing would be at a density of about 101 dwellings per hectare. What would this mean for the height and built form of any new residential development brought forward on the site?

12. Morgan Real Estate are strongly supportive of the site being developed at high density in order to make best use of the land. The policy should be flexible so that the height and density of the development is proportional to the target density and also different types of housing proposed. Ultimately, the height and built form would need to be subject to the design process and would need to take account of the relevant opportunities and constraints, ensuring density is maximised whilst managing impacts.

**Q2** What sort of retail is envisaged at this site and how consistent is this with other policies in the plan and the Framework? Is the proposed scale of retail development appropriate and justified?

13. Policy SBA2 does not specify a particular type of retail development, instead stating that development should include “Retail or commercial units”. Morgan Real Estate are broadly supportive of retail units being incorporated into allocation, subject to feasibility and viability.

**Q7** Is it sufficiently clear what the delivery of ‘an impressive and memorable city centre gateway’ entails? Is the policy effective?

14. This wording is not considered clear, as it is highly subjective what constitutes an ‘impressive’ and ‘memorable’ development. This type of language, if used at all, should be kept to the supporting text and not included in the policy wording itself.

**Q8** Are the requirements set out in Policy SBA2 justified, consistent with national planning policy and based on robust, up to date evidence? Have these requirements been adequately tested to ensure that they are viable and deliverable?

15. We do not consider the requirements from E to H to be justified as they essentially replicate existing requirements in other draft policies. Furthermore, we have challenged the basis of these requirements within our responses in Matter 6.

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### **Q9 What is the justification for the suggested modifications to the Policy SBA2 and its supporting text? Why are they necessary for soundness?**

16. As noted, we consider the suggested modification to Policy SBA2 to include for a 'range of housing' including for students is justified in order to ensure development viability.
17. Morgan Real Estate also support the proposed inclusion of 'a potential hotel' within the policy wording, in response to the request made in our Regulation 19 representations.
18. We continue to maintain however that, whilst not set out in the Council's suggested modifications, both Policy H2 and Policy SBA2 should be amended to state that the capacity of East Gate is 700 dwellings, rather than 691, to maximise flexibility and viability.