

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 7 (Meeting Housing Needs)

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



Issue 1 – Affordable Housing – Policy H4

Q1 How will affordable housing be delivered on brownfield land as a result of Policy H4? Does this approach reflect the evidence in the Local Plan Viability Assessment and its Addendum?

1. Morgan Real Estate are in general support of the delivery of affordable housing subject to specific site viability. Viability evidence within the Local Plan Viability Assessment and its Addendum supports the 15% affordable requirement, however it should be noted that at higher benchmark land values the viability is weaker for flatted schemes of 15 dwellings or fewer. Viability should therefore be considered on a site by site basis.

Q2 How have the requirements for affordable housing on brownfield land been established as part of the plan-making process? Are they 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?

2. As above, Morgan Real Estate generally supports the provision of affordable housing. However, while we broadly support the proportion of affordable housing on brownfield sites (provided each site's viability is considered) we are concerned about the lack of clear evidence for the proposed tenure split of 50% social rent and 50% affordable home ownership. The Exeter Local Housing Needs Assessment 2024 indicates that about 47% of those in need of affordable housing wish to become homeowners, but this figure doesn't necessarily reflect actual demand for that tenure. We recommend revising the policy so that this split serves as a baseline, allowing for current, site-specific data on need and viability to guide the final tenure mix for each development.

Q8 What is the justification for the suggested modifications to Policy H4? Why are they necessary for soundness?

3. The suggested modifications SMM29 and SMM30 are both required to align the policy with the evidence set out in the Exeter Local Housing Needs Assessment 2024, which is currently the most up to date evidence of affordable housing need.

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Issue 2 – Rental, Communal and Purpose-Built Accommodation – Policies H5, H6, H8, H9, H10 and H12

Q4 What is the justification for the locational requirements for purpose-built student accommodation in Policy H10?

4. As set out in the previous representations, Morgan Real Estate support the principle of purpose built student accommodation (PBSA) being focused in central locations. Including the East Gate allocation per our responses to Matter 4. PBSA should be included within specific allocations as it can, particularly where part of mixed use schemes ensure the viability and deliverability of schemes in the city centre.

Q11 In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

5. As noted in our response to Matter 4, we are supportive of suggested modification SAMM113 which would explicitly introduce purpose built student accommodation into the East Gate allocation.

Issue 3 – Issue 3 – Custom and Self-Build Housing – Policy H7

Q4 Are the requirements set out in Policy H7 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?

6. Further to our previous submissions at the Regulation 19 stage, we wish to reiterate our significant concerns regarding the requirements outlined in this Policy. 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

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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.

7. As stated previously, 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.
8. In light of the above, we strongly recommend that this policy be thoroughly reconsidered.

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

9. We generally support modifications SMM34 to SMM36 for bringing needed clarity to this policy, however we continue to strongly oppose the basis of the policy itself.

Issue 6 – Accessible Homes – Policy H14
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Q1 How has the requirement that 10% of affordable homes should be built to meet wheelchair user and accessible and adaptable standards, as set out in Policy H14, been established as part of the plan-making process? Is it based on robust, up to date evidence?

10. As set out in previous representations at Regulation 19 stage, Morgan Real Estate support the inclusion of a policy requiring accessible dwellings where there is evidence of need. However, we object to the current draft wording because its requirements are not justified by the available evidence. National policy—including the Written Ministerial Statement (25 March 2015), Planning Practice Guidance, and the NPPF (December 2024)—is clear that optional technical standards such as M4(2) and M4(3) can only be applied where there

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is a demonstrable need. This sets a high bar that goes beyond the Council simply considering increased provision desirable.

11. While the Local Housing Needs Assessment (December 2024) assesses potential need for adaptable and accessible homes, Section 7 does not justify requiring all market and affordable housing to meet M4(2), nor requiring 10% of affordable homes to meet M4(3). Any such requirements must be supported by clear evidence. The draft policy should also recognise that site-specific factors—such as topography or the feasibility of lifts in apartment buildings—may make meeting these targets impractical or impossible, and that this should not render a development unacceptable.

Q3 What is the justification for the thresholds in Policy H14 where Building Regulations M4(2) and M4(3) standards are concerned? Are the requirements justified and have they been subject to appropriate viability testing?

12. As noted above, these thresholds are not justified by evidence.

Q5 What is the justification for the suggested modifications to Policy H14? Why are they necessary for soundness?

13. The suggested modifications are not justified as they are not supported by evidence requiring at least 10% of affordable homes to meet M4(3).