

Exeter Local Plan: Examination in Public

Hearing Statement – Matter 3 (Spatial Strategy and Distribution of Development)

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



Issue 1 – Spatial Strategy and Liveable Exeter Principles – Policies S1 and S2

Q2 Is the strategic approach of focussing development on brownfield land justified? Are Policies S1 and S2 effective in this regard? What greenfield development opportunities are provided?

1. Morgan Real Estate strongly supports the strategic approach of focusing development on brownfield land. This approach is demonstrated within the Sustainability Appraisal to maximise positive effects and minimise negative effects when assessed against the 14 strategic objectives.
2. Morgan Real Estate strongly supports the aim of offering “*good quality homes of various types in the city to meet Exeter’s different needs*” and developing brownfield sites “*close to the city centre to maintain its vitality.*” It is essential for the Local Plan to ensure a wide selection of feasible and developable locations throughout the city, making the most of sustainably situated sites near the city centre.
3. The allocation of East Gate within Strategic SBA2 is a key example of such a site, and Morgan Real Estate strongly support its allocation within the Local Plan.

Q5 Is the broad distribution of growth (as set out in Policies S1 and S2 and as shown on the key diagram), consistent with paragraph 109 of the Framework, which states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes?

4. The distribution of growth is broadly consistent with the former paragraph 109 (now paragraph 110) of the Framework, as the proposed allocated sites score positively against the Services, Facilities and Education and Sustainable Travel criteria of the Sustainability Appraisal.
5. The draft allocation of East Gate through Strategic Policy SBA2 is aligned with the objectives of paragraph 110 of the Framework, being close to the city centre and therefore in proximity to key services and facilities, as well as sustainable transport options which will respectively limit the need to travel and provide sustainable alternatives when travel is required.

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Q6 What process did the Council follow to determine the distribution of this new development? Was this process robust and based on reasonable judgements about where to direct new development?

6. Morgan Real Estate are satisfied that the process followed in determining the distribution of new development is robust and based on reasonable judgements, specifically in relation to the East Gate allocation. We expect the Plan to set out a range of allocations on a full range of sites.

Q9 Has the overall distribution of growth and development been fully informed by the SA and other evidence? What adequate reasonable alternatives have been considered?

7. The overall distribution of growth is informed by the outcomes of the SA, which demonstrates that three reasonable alternatives (focus on developing greenfield sites, dispersal on smaller sites, and focus on public transport hubs) do not score as highly against the sustainability criteria as the focus on large, strategic brownfield sites such as East Gate. We support the way in which the East Gate allocation has been assessed.

Q10 Does the approximate distribution of new housing and employment development appropriately reflect transport opportunities and constraints?

8. As noted, the allocation of East Gate for a mixture of uses is highly appropriate given its location near to the city centre and access to a range of sustainable transport options.

Q13 In terms of this issue, are any of the suggested modifications in the Schedule of Suggested Modifications necessary for soundness?

9. No, there are no suggested modifications in the Schedule of Suggested Modifications related to this issue that are necessary for soundness.