

Good Morning Mr Young

Please accept the following submission in relation to requests for revised comments on the allocation of J27 within the MDDC local plan submission 2013 -2033.

I will detail comments against the relevant paragraph numbers as detailed within document ID02 Matters and Issues.

Para No1

The evidence base that has been submitted cannot now be considered to be robust, given its age and lack of consideration being set against previously unknown factors. These include the continued lack of economic growth across many U.K. Economic Sectors with reevaluation of all sector growth by the Bank of England and Central Government.

No effects within the UK economy, given the Brexit vote, were taken into account nor was the now known result considered within the report. Such a major policy shift cannot simply be ignored and any evidence being considered must be revised to take account of this major effect within the UK economy to be considered robust and relevant.

Para 2

Any commentary, including mine, against need is subjective and all arguments should only be considered against known and developing factors that affect the projection of need as put forward. When considering such a large scale development and the expected longevity of any such development, these factors must be fully taken into account. The well documented and accepted shift in UK shopping habits continues to have a dramatic effect on high street sales as internet shopping continues to grow at an unprecedented pace. Indeed many well known branded stores are continuing to alter their high street presence and move towards internet based access to their products. Therefore the predicted "need" of such large scale floor space has diminished to an extent I believe negates any requirement for the OSV.

Para 3

No, I do not believe the sequential tests have been rigorous enough and actually contradict other MDDC policies that are engaged to boost local towns and the economic vitality of them.

Any considered development needs to be set adjacent to current towns not apart. The location of J27 is set apart from all local towns. With the ability to access any permitted development totally dependant on access by car or currently none existent bus routes.

Any footfall from independent and passing traffic can only detract from the possibility it would have stopped in Tiverton or Cullompton as you can only spend your £ once.

Any permitted development for retail will undoubtedly have a negative effect on local and smaller businesses within the surrounding communities.

Para 4

Although it is acknowledged the duty to co operate has been undertaken the facts are that these were met with strong objections on how any permitted development would effect the wider economy. Thus

conclusion must be accepted when looking at the effect in the more local and nearer towns will be greater as detailed above in para 3.

Although officers have continually stated a duty to co operate was not a duty to agree I hope the objections are not simply ignored as is the case by MDDC given the determination to include J27 and its associated policy.

Para 5

In my view absolutely not. The questions at this point are now starting to become more specific set against the project known as Eden Westwood. Yet at this point I must stress the continued and at times specific instructions given to all councillors that this was only a land allocation and no reference to this scheme was to be allowed - as it could be seen as pre judging any as yet to be received application. When consideration is given to the wider question of "is the plan sound" this aspect must be considered in some detail.

There is no clear evidence that a visit to a surf park then generates a secondary benefit of visitors attending an OSV, both are specific in terms of the "why" or "reason" for the visit and do not easily cross.

Para 6

The OSV has in my opinion not been proven as necessary for the local or wider economy. Its only requirement would be to provide an economic crutch to the wider development, its requirement as a self fulfilling and worthwhile element is non proven and subjective at best. No argument that has been put forward simply regarding "need" has been satisfied.

The scale of tourism that could be attracted is subjective. There is little doubt that some would visit, however, the main argument is that "passing traffic" en route to other destinations would be persuaded to interrupt their journey. This must be seen as unproven and subjective with the same weight of argument given to the comment that having travelled for several hours the main objective would be to reach the final destination not pull off for a quick surf ride or buy some jeans at a local OSV.

Para 7

May I ask that at this point consideration is given to the journey that the developer and council has taken to get to this point. It is a documented fact that initially the wider scheme included a distribution centre on the opposite side of the road. Whilst I appreciate this is no longer part of the application, and therefore is not a matter for consideration, I would question the fact that the developer withdrew this element in order to secure support from members. Having moved from a position of stating that without the distribution element the whole project was financially unviable to withdrawal overnight and still predict financial stability was contradictory to say the least and must bring into question any replacement argument as being sound. This change of course cannot go unchallenged when considering the viability of the OSV and the requirement or stated requirement of all revised sections of the proposals. A detailed and proven financial model must be provided to give sufficient confidence in the viability of the project. Yet, and I return again to the stance taken by senior officers and some cabinet members that, no conversations could be requested on the viability of the project as we were simply

looking at a land allocation. This is a vital point and one that is pinnacle in the " soundness" of the process to include J27.

I cannot see any fact based evidence that provides assurances on need or viability, simply more table top modelling that has failed to take account of recent national and international policy change, economic position change and prediction of poor economic growth that will effect spend and investment.

Para 8

Simply, No !

How? No evidence is available to show that by allowing the proposal will generate any additional footfall into the local towns. Even if the argument that passing traffic would stop to interrupt a journey is accepted this must also be seen as evidence that current traffic that may have pulled into other available service areas will no longer do so. Where is the evidence that by attracting any traffic into J27 then has the effect that the same would continue to delay their journey by visiting local towns? The same argument must be accepted for how the tourist economic spend will be spread, it is not required to be an economic expert to understand that with shrinking disposable income visitors can only spend and will only spend in limited locations.

No planning measures can protect the local economy from this economic reality.

Para 10

Absolutely not, indeed and again I must ask for the reader to look at the journey to this point and past predictions that are still made as current.

I have stated that we (members) were unable to look at the financial viability of the project as such detail was forbidden territory - given this was only a land allocation. Therefore few if any questions have been allowed on viability. Despite this it is known that the development was to have a pedestrian footbridge over the M5 from Tiverton Parkway station allowing access to visitors arriving by train and was detailed as giving relief to J27 junction and reducing traffic either public or private vehicles.

It is now known that this access point has been removed and therefore any predictions on traffic levels are no longer relevant , yet no agreement or forecast on how this element of footfall will now be accommodated access has been made, as a minimum at total remodelling of predicted traffic / visitor levels must be made pre any determination.

Add to this the presumption that J27 has the capacity to cope with the projected traffic volumes is unproven, indeed recent examples of heavy seasonal traffic have seen major congestion at J27 without the additional traffic.

How any required modification would be costed and paid for must be seen as relevant as without known and agreed investment from national government, i.e. Highways England any such alterations would be economically unavailable to the developer and without such alterations the development would have hugely negative impact on the immediate and surrounding road network.

The above concludes my non technical observations and issues connected with the inclusion of J27 within the local plan. I ask that the latest known and predicted economic forecasts be considered and the effect Brexit is having in investment within the UK. The lack of fact based evidence is stark and the reliance of prediction and table top forecasting dangerous given the effects such a development would have in scale and time.

All evidence tests that have been submitted are now both dated and in some cases irrelevant given the passing of time and new economic factors.

Local opinion albeit some is emotive has to the greater point been ignored as it suits the supporters both external and internal to do so and this must call into judgement how the plan or this part can be tested for soundness and non pre determination for inclusion.

With regard to my initial submission I believe it is vital to ask that the process that senior officers undertook to present the project be seen as biased and would ask the Inspector to seek an unedited version of the audible tape to the council meeting of 22/09/16 This clearly shows Senior Officers, Head of Planning amend Cabinet Members being allowed to reference the Eden Westwood project when all members and speakers had been instructed that this was a consideration of a land allocation only and Eden Westwood was NOT to be discussed as an individual project. The current tape has been heavily edited to less than 60% of the actual meeting time .

To seek copies of all " indicative " plans as shown to council and public at that meeting and previously at officer led update meetings and compare these to the published Developers plans, this clearly demonstrates a bias towards one promoter and one project.

In conclusion I ask for the allocation and associated policy for land at J27 to be removed from the MDDC local plan 2013-2033.

Bob Evans
MDDC
Lower Culm