

Mrs Gillian Evans [5824]

Thank you for the opportunity to make revised comments in respect of the land allocation at J27 of the emerging MDDC Local Plan

I have taken your paragraph numbers as detailed within document ID02 Matters and Issues and put my answers to those paragraphs.

Para One:

MDDC is predominantly a rural District Council consisting of four market towns, Crediton, Tiverton, Bampton and Cullompton along with villages varying in size from Willand to small hamlets.

A recurring theme throughout my comments will be based around members of the public being denied the opportunity to discuss detail of the specific development. This is not an appeal for a planning application on a particular project, it is an enquiry regarding land allocation for a leisure, tourism and retail development within an emerging local plan.

However, the known tourism project consists of a: a surf park, two hotels, the "Eden Ark", a motorway service area and a Designer Outlet Village (DOV) - the developers assure us this will be more than your usual Out of Town Shopping Village.

The scale of the development is out of character with the area it is situated in.

The developers and the council hope to tempt the "rivers of gold" (traffic) flowing past J27 heading for points south, north and east to stop at J27 and provide little evidence to substantiate this.

Will the DOV become a destination shopping experience similar to Bicester DOV? What market is there for a DOV in a tourist area?

The International Monetary Fund (IMF) has slashed its growth forecast, citing a slump in economic performance since last year's Brexit vote. UK GDP growth is expected to ease mainly due to slower consumer spending as rising inflation squeezes household budgets. Two headlines from recent newspapers citing a slow down in economic growth and a tightening of household belts to take account of inflation. The longer term effects of Brexit are unknown and are likely to affect the movement of job seeking EU nationals. All aspects not taken into account when the plans were being processed - will the financial aspect of the project still stand firm given the shaky financial sector.

Para Two:

In a rural area renowned for tourism is there a need for a DOV? Take away the tourism and you have a limited catchment area. The DOV will rely heavily on visitors to the area especially during the peak holiday season. Ask the question will you take a drive to J27 to go shopping knowing that thousands of other vehicles will be on the road heading to holiday destinations further afield.

Is there a regional need? The nearest urban catchment areas are Exeter and Taunton - both equidistant from J27 and both well served with their own retail outlets and out of town shopping opportunities.

The goods-floor space of the DOV will far out strip the shops within the nearby towns of Tiverton, Cullompton and Wellington, all of whom rely heavily on local shoppers and passing tourists.

The DOV is likely to have a detrimental effect on the businesses within these towns.

We are told that our shopping profile is changing with more and more of us using the internet to shop with the option of a shop pick up or a home delivery. How will the DOV sit with this changing profile?

To take a phrase often used - you can only spend your pound once.

Para Three:

In order to add this project into the local plan MDDC have had to revise their plans for a town centric policy. The early drafts of the local plan showed the market towns as being the focus and we had a much trumpeted plan based on maintaining and improving our market towns through growth. With the advent of J27 these plans have been down graded with job opportunities relocated to J27.

Cullompton has had its employment area reduced despite an influx of new housing on the doorstep.

There is no conurbation adjacent to the development and therefore a car will be essential for access, whether shopping or working. However, we are told that the main thrust of advertising will be to tourists. If those tourists do stop at J27 will they then travel on to the nearby towns of Tiverton, Cullompton or Wellington.

Any aspect of retail development at J27 will have a detrimental effect on local rural businesses.

Para Four:

Whilst MDDC have undertaken their duty to cooperate with surrounding councils, these councils have spoken out against development at J27 as being detrimental to current market places. A duty to cooperate does not mean a duty to agree however consideration should be given to the comments from the surrounding councils.

A duty to cooperate should also apply to the communities local to J27 and the developers have failed to engage with the villages surrounding J27. Following their initial forays into the rural villages meeting with negative responses. Instead of attempting to placate these communities they chose to take their subsequent presentations to the towns of Mid Devon ie Cullompton, Tiverton and Crediton and a friendlier audience. Independent surveys have been ignored - more importantly those that show a negative stance for J27. The developers have undertaken their own surveys but again in neighbouring towns rather than within the locality, highlighting little or no discussion with those most affected by the development.

Para Five:

On the face of it there would appear not to be a synergy between the DOV and the leisure and tourism aspects of the development. However, due to the rural location of the site the DOV will rely on attracting holidaying visitors rather than having a large urban catchment area on its doorstep therefore yes there is a synergy as both aspects of the development rely on tourism.

The developers have stated that the surf park and the Eden Ark are not financially viable and therefore the DOV is required to support the leisure and tourism aspects of the development.

It should be noted that just prior to submission of the local plan a Distribution Centre of some 750,000 sq ft was envisaged on the opposite side of the A38 (still at J27). This, the developers would tell us, was required to give financial stability to the whole development and in particular the non-profit making tourist and leisure complex. The Distribution Centre was at the last minute pulled from the proposal due to the negative publicity it was receiving.

Para Six:

Is there a need for a tourist attraction at J27? We are surrounded by tourist attractions and Devon is itself a tourist attraction. Will motorists break off on their journey to pay for an hours surfing or visit the Eden Ark? This is the profile of the visitor the developers say will be attracted to the area.

Have the developers undertaken a feasibility study to show a need for a tourist area at J27 or are we better off with the promised Gloucester Services type motorway service area - an improvement on what is there but not a large scale development.

Para Seven:

There is no evidence available to members of the public to gauge the viability of any aspect of the project or the creation of jobs within the area. We were never given the opportunity to question the poor quality jobs on offer.

Leisure and tourism is not a year round business, and even if it is with visitor numbers falling during the winter months employees are generally laid off. The jobs on offer within this sector are usually of the zero hour, short term contract, part time hours type of employment. Where are these employees going to come from? Will they be able to afford to travel from Taunton and Exeter? Added to this retail businesses also rely on part time working to give flex to staffing levels. The concerns voiced by many were around the poor quality jobs in an area where children generally have to move away to pursue careers.

The public were never allowed to question any aspect of the viability, likely employment profile or any commercial aspect of the proposal. Whenever we took part in Council meetings we were advised, by Senior Officers and Cabinet Members, that this was an allocation of land and to discuss the viability or otherwise of any named project could lead to predetermination at planning submission. However at the Full Council meeting of the 22nd September 2016, various members of the council then proceeded to discuss Eden Westwood and the merits of the DOV, the Surf Park and the hotels along with the jobs that would be created.

Para Eight:

My feeling is that town centre uses as we know them today cannot be protected by planning furthermore the Cabinet member for Planning and Regeneration quoted a figure of 9% of local businesses in nearby towns would be lost if the development goes ahead. How will planning rules ensure that shoppers will continue to use the town centres? Instead will see a change in profile of the town centres with fewer shops and businesses. Planning rules are to be relaxed to allow re-development of redundant buildings.

Para Ten:

The developers have not evidenced an understanding of the uses of not only the M5 and J27 but also fail to show they understand the ebb and flow of traffic on the local roads namely the A38 and the B3181 and the pinch point at the Waterloo Cross roundabout. At the recent Minerals Plan Enquiry the Inspector ruled that work needs to be undertaken at this roundabout. Furthermore the A361 is the main route to North Devon. It should be understood that the A38 and the B3181 are the diversion route for the M5 if it is closed. J27 is a bottle neck during the peak holiday season and has only recently undergone limited refurbishment to allow traffic to flow off the motorway. However as with all changes to rights of way traffic now builds up on the A38 and the A361 which unlike the motorway do not have the benefit of traffic light control.

There was promise of a footbridge being installed linking the development with Tiverton Parkway Railway Station to assist with alleviating traffic destined for J27 - this I understand has now been withdrawn.

With no large conurbation within walking distance and a very limited public transport system how would employees get to work? If travelling by car their arrival and departure would add to the traffic profile.

The developers do need to gain an understanding of the businesses (mainly distribution) nearby and their traffic profile.

This is my submission in relation to those questions raised.

Regards,
Gillian Evans