

Statement in respect of Strategy and Site Allocations: Tiverton and Cullompton (issues 3 and 4)

3.0 In paragraph 6.7 of the SHPTP, MDDC claim (unquantified) good community support for strategic growth in Cullompton. It is clear that Cullompton Town Council supports the proposal but other than that this statement appears to be based on feedback gathered in the 2013 consultation. An analysis of that data suggest that 155 respondents expressed some sort of preference for the East Cullompton site. This is significantly fewer than supported more widespread development in that consultation and also significantly fewer than what are believed to be the considerable majority commenting unfavourably on the proposed plans at East Cullompton out of the 1,000 letters received by MDDC in respect of the 2015 Local Plan Review and the 600 letters objecting to the scale of development in the revised Local Plan in 2017. (Sustainability Appraisal 2015 4.19)

3.1 It is clear that a very significant scale of infrastructure spend is needed to justify the superior scoring that MDDC has given Cullompton over other sites in the region.

3.2 Looking at the detail of the assessment for East Cullompton it scores 0 for mitigating the effects of climate change, but as SA17 says, without mitigation it would score -3. While policy S11 acknowledges that East Cullompton is a Critical drainage area, in the absence of adequate measures, the scoring should revert to -3.

Similarly the site scores +2 for delivering the necessary infrastructure. In the absence of this being delivered, MDDC acknowledge it would score -3. Given the grave doubts about delivery on infrastructure and flood relief a more reasonable score for East Cullompton seems to be -1 , ranking it 4th out of the 5 alternatives spelled out in the Sustainability Appraisal (2017 update p 38 and pp 258-267).

3.3 Multiple representatives of MDDC have confirmed in open meetings recently that they would not anticipate any meaningful work on a southern junction on the M5 in the next ten years. They have also admitted that funding is likely to be an issue for this infrastructure. At the recent cabinet meeting to approve the Garden Village consultation, the only reassurance that was given in terms of funding was that government pots of money for infrastructure tend to appear and that MDDC has had some success in applying for them. This is not a coordinated strategy.

3.4 The SHLAA on p 73 said in respect of East Cullompton that ..." in the opinion of the Highways Agency...the site should not be included...until it can be demonstrated that improvements can delivered to the Strategic Road Network capable of accommodating the traffic flows likely to arise. Such an allocation would otherwise be unsound." The only meaningful comment that DCC have made about a new motorway junction south of Cullompton is that "there is no evidence at this stage to suggest that the scheme is not technically capable of being delivered." (Preliminary Transport Position Statement 21/12/16)

3.5 In addition to the above MDDC has been clear in open meetings that no work is likely to be done upgrading the A373 to Honiton in the foreseeable future following consultation with DCC. Meanwhile the likely site for the Cullompton Relief Road to the south west of Junction 28, will have a limited effect on the growing traffic from the development to the north-west and no real effect on the proposed traffic to and from the east. On the rail front, Network Rail consistently deny that they have any plans to reopen Cullompton Station despite hopeful noises from MDDC.

3.6 It was interesting to note that at the last Garden Village stakeholder meeting, even solid supporters of the Garden Village were alarmed at how little infrastructure was likely to be in place before very significant development had taken place.

3.7 The policy choice to concentrate so much of Local Plan development at Cullompton needs to be looked at strategically, which would suggest that the 2014 SFRA should have been catchment based and not a hybrid of the level 1 and level 2 approaches outlined in NPPF.

3.8 The SFRA is flawed on a raft of points: it is not catchment based; it is modelled with generalised data - not best available data; it makes little consideration of critical assets; it shows no real analysis of development in the Functional floodplain and where and what scale of compensatory floodplain would be required. It also makes absolutely no reference to abundant available research papers on water cycle management and absolutely no consideration of Natural Flood Management (for which there were good UK and overseas exemplars available back in 2014).

3.9 MDDC have consistently avoided best practice as most recently evidenced in the scheme specific FRA for the proposed relief road with no consideration to flood impact of the proposed developments east of J28 (let alone anything else we know about J27 and the proposed Garden Village). Flooding doesn't happen on a piecemeal basis - so MDDC need to take the matter seriously and acknowledge (as the Arcadis report shows) that you cannot design out all flood risks - the proposed relief scheme will flood under certain known events.

Conclusion re Cullompton Allocation

4.0 The allocation of 50% of all new housing to Cullompton rests on a distorted view of community feedback and a false methodology that scores Cullompton highly for infrastructure that is not in place. There appears to be no confidence in MDDC's ability to deliver this infrastructure, no strategy in place to do so and comments from related bodies such as DCC and Network Rail call into question many of the soft ambitions that MDDC have made much of.

4.1 The flood work that has been done so far for the Local Plan shows a shocking disregard for the nature of the environment around Cullompton and junction 28 and takes no account of recent flooding events or the total scale of development planned in and around the floodplain. It would clearly fail the most recent changes to National Planning Policy Framework guidance (para 156, 24th July 2018), which includes a requirement that strategic policies '...should consider cumulative impacts in, or affecting, local areas susceptible to flooding...'.