

Statement in respect of Other 2017 Proposed Modifications (issues 3 and 4)

1.0 I would like to comment in particular on the Strategic Housing Policies Topic Paper (SHPTP) of March 2017, that has been produced since our last opportunity to submit comments. I have not been able to examine the further Housing Topic paper that has been promised by MDDC but is as yet unpublished.

1.1 Further releases of government data since the Strategic Housing Policies Topic Paper (SHPTP) of March 2017 show that MDDC's household projections remain aggressive. The **DCLG Household projections** that MDDC quote in Appendix 1 shows a projection of household growth in the Local Plan period of 5,499 compared to MDDC's target of 7,860 completions. The most recent statistics (which are now provided by the ONS as of 03/12/18) show that the projection has fallen still further to **4,712** (37,781 in 2033 compared to 33,069 in 2013).

1.2 Meanwhile the most recent **ONS population statistics project growth of 6,000 between 2016 and 2033, whereas MDDC's housing plans are based on growth of 10,700** in population in that period. This overestimation of growth is reflected in the actual population growth in the first 4 years of the plan period. The ONS shows a population of 80,623 in mid 2017, while the SHMA had forecast growth over the first 5 years of the local plan period from 78670 to 82,036, which is well over 0.8% compounded. The actual population at 2017 shows 4 year growth of 0.6%.

1.3 In Appendix 2 of the March 2017 SHPTP, DCC point to an upwardly revised Mid Devon population forecast of 91,534 in 2033 (as opposed to 90,611 in the 2015 SHMA). It is hard to square this with the cut in the ONS number from 88,353 in its 2012 projections to 85,900 in its 2016 data.

1.4 These aggressive housing need forecasts are compounded by **MDDC's insistence that they should not rely on post-recession growth forecasts alone** (para 3.7 in SHPTP). Their forecasts are based on an assessment of 2008 and 2011 figures. It is now 10 years since the recession of 2008 and if anything growth forecasts are weakening further along with national net immigration forecasts. The claim that "post-recession household projections ... may be overly pessimistic about economic growth" (para 3.7 SHPTP) smacks of a post facto justification of an over aggressive forecast.

1.5 In para 3.7 of the SHPTP, MDDC say that DCC has considered the implications of 2014 based assumptions and advised that they do not significantly change the SHMA, although it acknowledges that the household based projections are lower than those used in the SHMA. Given that the **ONS 2016 household growth assumptions have been revised down a further 15% from 2014**, this assumption lacks credibility. It is also worth noting that trends on declining household sizes in England have flattened in the last 15 years and even increased in the last few years. It seems odd that MDDC are not prepared to factor this into their forecasts (para 3.7 SHPTP).

1.6 In para 2.4 of the Local plan **MDDC allocate 10% more housing than they believe is required** (and 15% more than the Core Plan) to provide flexibility and account for unforeseen circumstances.

1.7 In para 4.5 of the SHPTP, **MDDC says that it doesn't consider it appropriate to include windfalls** as part of the housing allocation for a number of reasons that seem if anything to argue the reverse. As there have been an average of 214 windfall sites a year (SHPTP 4.3) compared to MDDC's target of 393 dwellings p.a., this seems a very surprising exclusion. It is especially surprising when the Exeter Housing Market Area HELAA Methodology of April 2017 submitted by MDDC says that "Local Authorities may make an allowance for windfall sites" (para 7.5) and even offers a methodology for doing so in Appendix 4.

1.8 It is interesting to note that the 2014 SHMA itself questioned whether "new information" might "trigger a reassessment... earlier than 2019".

1.9 If one takes MDDC's preferred DCLG 2014 forecast for household growth of 5,499 and allows MDDC's 10% cushion on top as well as the 260 houses that they have included for additional growth resulting from junction 27, that would give one a housing target of 6,308 compared to MDDC's target of 7,860. If one were then to allow that 107 windfall sites might come due each year (half the 10 year average and 10% lower than the lowest year in that period (122 in 2006/7) and also significantly lower than that suggested by the HELAA methodology)), **the planned housing site need out to 2033 is 4,168. This is just 53% of MDDC's provision in the Local Plan.** If one accepts the validity of the 2016 ONS data (which MDDC are not inclined to do) the household growth of 4,712 treated in a similar way would suggest a planned housing site need of 3,303 (or 42% of MDDC's provision in the Local Plan).

Conclusion on broad housing numbers

2.0 **MDDC's housing targets are extraordinarily aggressive and bear little relation to available data. The Council has ignored the consistent flow of subsequent data which makes this even more apparent.**

2.1 **MDDC's ignoring of windfall sites and overbudgeting versus even their own housing need projections means that the amount of land being earmarked at this stage in the local plan is even more excessive than the housing target itself.**

Comments in respect of the scale of allocation of housing to Cullompton

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.** MDDC displays no real confidence in its ability to deliver this infrastructure, there is 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

Representation from Nicholas Allan

requirement that strategic policies ‘...should consider cumulative impacts in, or affecting, local areas susceptible to flooding...’.