

Nicholas Allan remarks for the Inspector**20/02/2019**

Good afternoon Sir.

The 2017 revised plan and subsequent documents highlight the flaws in the original plan. In many ways, the 2017 version is more unsound than the original. It is speculative and appears undeliverable. The Council's submissions to your hearings confirm many of the issues we have highlighted, although MDDC have chosen not to draw logical conclusions from this.

Housing numbers

The OAN has been raised from 7200 to 7860 in the 2017 version over the plan period to take account of growth at J27 if the current proposal proceeds. In MDDC's submission MH-MDDC-1-2, they concede in each of paras 1.2, 1.3, 4.5, 6.2, A1.12 and A1.31 that subsequent demographic data suggests that the OAN is overstated. They even quantify the overstatement at 2360 in paras 6.2 and A1.12. They justify this on the basis of a buffer for economic growth. In the Local Plan they have already built in a buffer for economic growth of 10%, so why are they now saying they need a buffer of 43%? Incidentally none of the other main participants in the GESP (EDDC, Teignbridge and Exeter) build in a buffer to their local plans. Why are MDDC raising the OAN for J27, while not taking account of the recent data that suggests it is significantly overstated.

It is also interesting to note that in para 2.5 the Council says that it uses long term trends to boost the economy above recent demographic trends, but then says in para A1.14, that 2008 numbers can no longer be seen as normal but reflect an unsustainable credit boom. The methodology is clearly inconsistent.

To compound this issue, the Council say in para 5.4 of MH-MDDC-1-5 that they do not include an allowance for delivery on windfall sites beyond current commitments, but that their housing trajectory is informed by the April 17 HELAA. The HELAA suggest a methodology for windfall sites, which the Council have chosen not to use. Each of EDDC, Teignbridge and Exeter do make an allowance for windfall sites. Given that these run at a 10 year average of 214 against MDDC's ambitions to deliver 393 houses a year, the omission appears nonsensical. If one were to allow for only 100 windfall sites a year it would increase the Council's buffer for economic growth to 62% over the remaining 15 years of the plan and would be even worse on 2016 data, which they choose not to use. The proposed delivery of housing sites is out of touch with reality, and the likely significant shortfall in delivery must call into question even further the Council's ability to deliver infrastructure for the scale of development they are planning in East Cullompton.

Selection of Cullompton as a preferred site

If infrastructure is not delivered, then Cullompton looks like a very weak site of the options in the table produced in each of para 1.27 of MH-MDDC 1-1 and para 3.10 of MDDC 1-3. In this table Cullompton is scored as though all the necessary work has been done to mitigate the effects of Climate Change, to deal with critical drainage and to deliver necessary infrastructure. In the absence of this delivery, the East Cullompton site scores -1, ranking it 4th of the 5 alternatives.

MDDC claim that the policy is shaped and chosen by local people but only refer to the 2014 Options Consultation, whereas the 2013 Scoping Report, which preceded it, expressed a clear preference for broadly spread development. When presented with the limited number of options in the 2014 consultation, there was a vote in favour of Cullompton, but the 93% number that the Council

present in para 1.21 of MH-MDDC-1-1 only represents 200 people, which is dwarfed by the subsequent number of letters protesting against it. It would be fair to say that Willand was more organised than the villages east of Cullompton in realising what was happening and organising accordingly. Cullompton Town Council clearly does support the allocation to Cullompton, but there was considerable disquiet expressed by Cullompton residents at the last Garden Village Stakeholder Forum, when it became clear from the MDDC representatives quite how hazy the plans for infrastructure delivery east of Cullompton are. As an aside the current consultation on the Garden Village asks residents how they would like it to be planned, not whether they support it.

The Junction 27 plans are speculative and the site has not been properly assessed for housing. It is clearly at less risk of flooding than J28 and would need less infrastructure delivery. It is also beside a railway station, whereas Network Rail consistently deny that they have any plans for a station at Cullompton despite MDDC's protestations to the contrary.

The preferred relief route being built to the south west of J28 will only bring marginal benefit to the plans at East Cullompton, but it is only estimated to cost £14M. The more logical route for the Council's long-term plans to the east of the motorway had a price tag of £51-53m, and that is without a new motorway junction to the south of Cullompton. The route chosen will help resolve problems in Cullompton town centre, but choosing this option must diminish the possibility of getting funding for the scale of work necessary to enable the development that MDDC have planned in East Cullompton. It is interesting to note that 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 be 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". DCC have also made clear that they do not envisage improvements to the A373 in the foreseeable future, despite the traffic volumes having increased significantly in the last few years, before any development has even started at east Cullompton

MH-MDDC-1-10 para 10.2 says that the Plan seeks to minimise the impact of development on climate change through the provision of flood measures and in para 10.3 say that the policy is proportionate. If that is the case why spend £1m on a catchment-based flooding study only now for the Garden Village, when we have been asking for such work to be done for 5 years. The SFRA does not reference NFM, despite MDDC's attempts to claim the benefits of it in para 1.19 in MH-MDDC-2-3. The SFRA also uses 2008 data in the 2014 study despite the severe flooding in and around Cullompton in 2012, which it ignores. The Arcadis report on the relief road acknowledges that it will flood and takes no account of the 1750 houses planned in East Cullompton. This all makes MDDC's scoring of Cullompton as a preferred site look disingenuous if not dangerous.

In conclusion looking at the NPPF criteria, this plan does not reflect the vision and aspirations of local communities (para 150), does not provide infrastructure for transport, wastewater etc (para 156), does not plan positively for the infrastructure required (para 157), is not basing planning policies on up-to-date information about the local environment (para 165), is not paying careful attention to viability and costs in plan-making and decision-taking and the sites and the scale of development in the plan is subject to a scale of obligations and policy burdens that threatens their ability to be developed viably (para 173), there is grave doubt that planned infrastructure can be delivered in a timely fashion (para 177). It is hard to argue that it meets any of the necessary criteria as it is not positively prepared, justified, effective or consistent with national policy (para 182).