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28th January 2019

Local Plan Review Consultation,
Forward Planning,
Mid Devon District Council (by email)

Dear Sir/Madam,

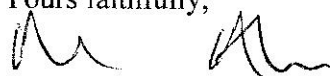
I would like to comment further on the changes in the MDDC Local Plan Review ahead of the visit of the Inspector next month. I would especially like to draw the Inspector's attention to the considerable amount of new evidence suggesting that MDDC's housing targets are unrealistic, and also the scale of the likely shortfall in infrastructure provision that was used to justify the allocation of 50% of new housing to Cullompton. There is considerable overlap between my statement and those made by Kentisbeare Parish Council.

I continue to believe that the Local Plan is poorly conceived, and in particular is based on poor underlying analysis of data and inadequate assessment of the ability to deliver properly. This belief is based primarily on 3 planks.

1. The **housing target set by Mid Devon is at odds with the evidence** at hand.
2. The **selection of Cullompton**, and especially east Cullompton, as the focus of long term development **is dictated by a presumption of infrastructure delivery**, which is neither planned for nor likely to be delivered in anything close to an appropriate timescale. Recent comments from MDDC and their representatives confirm this.
3. The **flood risk associated with the scale of development planned around Cullompton has not been assessed in a coherent fashion**. The Arcadis study is only designed to see if there is incremental flood risk from building a relief road and the 2014 SFRA does not even take into account data from the significant flooding we saw in both Cullompton and Kentisbeare in 2012.

I consider the plan to be unsound in terms of positive preparation, justification, effectiveness and consistency with national policy. In particular I would highlight paragraphs 156, 157, 158, 159, 162, 165, 173 and 177 of the National Policy Planning Framework (NPPF) in relation to the proposed plans at East Cullompton. I will look forward to discussing these points on February 20th.

Yours faithfully,



Nicholas Allan