

From: [Mark Rowan](#)
To: [Planning Consultation \(DPD\)](#)
Subject: Mid Devon Local Plan Review 2013-33 - Proposed Main Modifications Consultation
Date: 16 February 2020 09:58:41

Dear Sir/Madam,

I am writing in response to the above, with special reference to the proposed development East of Cullompton. The source documents employed are the Inspector's Post-Hearings Advice Note, the Sustainability Appraisal, and MDDC Schedule of Proposed Main Modifications.

1 The Inspector clearly states (para 3 Of Advice Note) that under Policy CU1 600 dwellings can be delivered before the TCRR is complete, and that the remaining 750 'must await its completion. MDDC under MM22 has chosen to interpret this as no more than 600 dwellings can be occupied prior to completion - but there is no limit on the number to be developed. I do not believe this is what the Inspector intended and await clarification on the issue.

2 By the same argument it is surely proper to impose a similarly drafted limit on the 500 houses that may be developed in East Cullompton before the TCCR is completed.

3 I note MDDC's continuing optimism on the date for the completion of the TCCR and their unwillingness to reveal the terms of funding. I have requested these (though so far without recourse to a FoI) and would ask that they do make them public in the interests of transparency.

4 Under MM07 (S9 Environment) I note that the word 'adjoining' the Blackdown Hills area of ONB has been replaced with the word 'within the setting'. I am sure that it was not Natural England's intention to permit any detriment to the surrounding landscape and would again welcome clarification.

5 I note that under numerous amendments (specifically but not limited to MMs 09,23, 24 and 25) the justification it is agreed that they are statements of common ground between MDDC, Devon County Council and Highways England. I would very much hope that all such pertinent points are agreed - but this does not constitute a statement of actions or timing which are surely required for such a plan to be sound.

Overall, although the MMs have been considered individually, I do not believe that MDDC has taken a sufficiently holistic approach - and has certainly failed to address the Inspector's concerns on the concentration around the Cullompton site and the sequencing which is largely dependent on external factors over which the Council has little control. At the very least no actions beyond those agreed for the TCCR should be contemplated until the Flood Report for the Culm area has been produced (please confirm when this will happen) and properly analysed. Since the entire Plan(for Cullompton, and therefore MDDC) is dependent on this being favourable, it cannot be considered sound until this is done.

Yours truly

Mark Rowan