

To WDBC/Independent Examiner

REVISED MACKPLAN (REGULATION 16 CONSULTATION)

Please consider all of my original questions/comments submitted for the Regulation 14 consultation.

Can you please also consider the further relevant points below about the revised MACKPLAN published on 16 August 2021; these include some about the MACK Team responses in Appendix C – Schedule of Comments, Responses and Regulation 14 Plan changes. My understanding was the Mack Team had a statutory duty to respond to all comments and questions raised at the Regulation 14 consultation stage; if you look at Appendix C (App C) you will see that many of these were just ignored (primarily the difficult ones?)

Six Affordable homes in Milton Abbot

The fundamental premise of the draft plan e.g. that we MUST have twenty houses in one location to guarantee the six affordable houses that are required has simply not been proven. Neither has the assertion there is overwhelming community support for new affordable homes in the MACK Plan area. (see App C page 87 answer to comment 69 - there is still NO documented evidence from the resident surveys and engagement meetings) App C Page 146 refers to two years ‘..evidence gathering’ of the need for affordable homes for local people but this has never been published.

There are comments (App C page 84 is one example) that new starter (affordable?) homes are essential for new young families to be able to afford to live in the area and vital for the future of Milton Abbot. Over the last five years, however, many new families *have* moved here and their children are now at the school. Young families are already attracted to the village and a perceived lack of low cost affordable homes has not prevented them from moving here.

The confusion over the ‘true’ threshold to require 30% affordable homes is still reflected in the revised Regulation 15 submission. App C (bottom of page 89) says 10 houses are needed whereas page 82 says 11+ and so does para 9.8.5 (page 61) in the Regulation 15 draft plan. Even if the threshold for delivering onsite affordable housing in Milton Abbot is above 10 homes I understand that if a development is between six and 10 homes WDBC can still take a proportionate financial contribution from a developer. If this is correct doesn’t this have a very significant impact on the draft plan?

The MACK Team comments (App C page 47) about two sites x10 homes or two sites x 11 homes are not particularly helpful especially when they dismiss all possibility of any sites being suitable to accommodate two separate developments.

Sadly, the offer of land for development in Chillaton (App C page 106, comment 73, C Site A – Land East of Marlowe Crescent) at 66% ratio affordable homes was very quickly dismissed by the MACK Team; on page 30 of the MACK Site assessment (Appendix 2-5) they actually confirm that six affordable homes could be built on this site. The possible total for the site is nine homes, well below the threshold we keep hearing is necessary for 30% affordable homes.

This type of offer, from what appears to be an altruistic landowner who is happy to effectively waive the ‘open market’ value of his land, is very rare and should at least be thoroughly investigated. It could have potentially left the way open for other much smaller developments in Milton Abbot and Chillaton because there is no longer any need to meet the affordable homes ratio criteria. Smaller developments

throughout the MACK Plan area is exactly what many people wanted (apparently) in earlier community surveys and engagement.

The MACK Team have indicated that (75%?) of Chillaton residents were opposed to this site in the 2017 Residents Survey. But the MACK Team have (on other occasions) said that these surveys were only a 'snap shot' at that time and it is residents views now that are more pertinent. Perhaps if Chillaton residents were given more accurate details of this offer (and its implications in terms of financial benefits to the village) they may have a completely different view of development on this site or in the village?

App C page 74 Q and A 117 – the MACK Team seem to indicate the draft plan recommendation of six affordable homes is 'drawn' from all the principal housing surveys but the AECOM HNA (Oct 2019) just repeats the same, 20 homes in Milton Abbot/means six affordable homes equation and the HNS (Feb 2020) clearly says four affordable homes. We are locked into this 20/6 equation but still WITHOUT any corroborative evidence. Ironically, the revised Regulation 15 draft plan still says FOUR affordable homes (see para 9.2.3.2. page 52).

It doesn't really feel like the AECOM HMS and HNA surveys were 'independent' when the aims and wording of these were agreed with the MACK Team (see App C page 57 Q and A 57)

MACK Housing Needs Survey Report – February 2020:

On page three - 'Principal Conclusions' and page 13 – Conclusion – there is clearly a conclusive assessment of FOUR affordable homes needed in the MACK Plan area; and advice is given that the report/survey should be used as '...evidence of need for up to five years'. The final recommendation in the HNS on page 14 advised the MACK Plan committee to consider options for addressing the need for FOUR affordable homes. Despite this, the 'need' was changed to SIX in the Regulation 14 draft – giving the justification for EVERYTHING that followed re: needing 20 houses on one site!

App C Page 73/74 (Q and A 112 - 117) relate to important questions I submitted about evidence of the level of community support for local affordable homes; the MACK Team don't seem able to produce this important information. It is a breakdown summary of the responses received to the Housing Needs Survey of February 2020 by INDIVIDUAL village etc. The 'Findings' section of the HNS clearly states: "A list of the main results broken down by parish will be produced on a separate document and sent to the MACK plan committee"

Paras 5.3/5.4 of the HNS also confirm comments from 41 respondents on possible development sites and 29 who gave their overall comments on affordable housing in the area – even if this material was sent in error to the Parish Council, why are the MACK Team unable to provide this collaborative evidence? It is strange the MACK Team don't know which document I mean, especially as their assertion has always been for wide spread support for the need for affordable housing? Residents have a right to see this document (see Q 114 – 116 page 74 – there was no response from the MACK Team)

When the availability (or perceived lack of) affordable homes in the area appears to underpin everything in the MACK Plan why was my reference to over 300 new affordable homes in Tavistock (App C page 90) completely ignored by the Mack Team? This amount of new affordable homes MUST have some bearing on the MACK Plan?

Finally, App C Page 168 (Duncan Smith for WDBC) states affordable housing policy 6-1 should mention JLP Policy TTV27 on rural exception sites and how these can help fulfil affordable housing need. In fact he says MOST neighbourhood plans do this. Again, even though providing new affordable housing is supposed to be the fundamental basis of the draft plan the MACK Team appear to dismiss his comments just because they have already chosen one site for all 20 new homes. If Policy TTV27 is a possibility couldn't it fulfil residents preference for smaller sites spread around the MACK Plan area?

Selection of Site E

AECOM does not appear to have applied identical criteria consistently to all ten possible development sites; there are also inconsistencies between the conclusions in their report and what was put in the Regulation 14 draft plan.

Page 13 of the Regulation 15 MACK Plan (3101) states the aims of the consultation process were to '...involve as much of the community as possible through all stages of plan development...' this was not done. There was NO local consultation on this site until December 2020. The MACK Team admits (page 52 App C, Q21) the Regulation 14 consultation WAS the first opportunity for any residents to comment on Site E. Their reasons for not telling residents about the new sites (from the Call of Sites) is totally unjustified (App C pages 22/23 Q and A1] and the comments about Lamerton are completely irrelevant.

The Locality organisation who give advice on good practice for creating neighbourhood plans say in their leaflets:

"...Common mistakes include things like consulting too late..." and "...Asking consultants to produce options before consulting the community is also poor practice. Consultation should not be treated as a one-off tick-box exercise. Also, analysis of consultation responses is not about counting the number of consultees making a comment, but considering the depth and range of responses."

"Avoid Tokenism: The purpose of undertaking community engagement is to inform the content of the plan. If the outcomes have already been determined, then community engagement is tokenistic (marketing)."

Locality also make clear Covid restrictions are NOT a justified reason to avoid community liaison and provide information on what to do if no public meetings are possible. Whilst I appreciate the Covid restrictions changed everything, it was very clear from items four and 11 of the MACK Team meeting of 12 March 2020 the team fully intended to inform residents of ALL potential development sites to seek views on identifying the most acceptable option(s).

AECOM were said to have produced an 'utterly independent' assessment of all possible development sites. (see MACK Team response to me - Q26 page 54 App C) However, they confirm (see answer to Q25) AECOM were given a verbal overview of the historical aspects of each site, told to consider the need for six affordable homes, 2/3 bed houses, local green space, a new community facility (!) and visual impact on existing properties; so in fact quite a lot of direction and a very tight remit in which to work!

App C Q and A 28 confirms AECOM were given all residents comments on the original five sites (before the Call for Sites) which obviously means they had NO comments to consider about any of the new sites,

including Site E. This cannot be considered a fair and impartial process. Worse, (see Q and A 30) AECOM were not told why there were no comments.

In their answer to Q138/139 (App C page 77) the MACK Team are adamant AECOM would not have reached a different recommendation if they had lots of objections about the five new sites, including Site E. How could they possibly know this? In fact they effectively say AECOM would have ignored the objections!

They say AECOM's judgement was based on which site had a '...reasonable prospect of getting planning approval'. This almost seems a 'new' criterion because until this point we were told that AECOM had to use identical (and impartial?) criteria? We know from many historical planning applications that decisions CAN be influenced by a lots of local objections!

It is ironic that in their answer to Q140 the MACK Team state that Site D was rejected for reasons other than simply the number of objections (eg water issues, traffic/access, privacy). The overwhelming source of AECOM's information about the (non)suitability of Site D was from residents objections! How could they/AECOM know what concerns may have been raised about Site E if residents had been allowed the opportunity to submit them BEFORE the Regulation 14 consultation. Also, the MACK Team (see page 21 Appendix 2-5 MACK Site Assessment) clearly attribute the strength of community objections as a major factor why site D was not suitable for inclusion as a development site in the MACK Plan. They even emphasise the importance of the MACK plan as a '...community led endeavour...' and the public rejection of Site D was only '...supported by the independent views of AECOM.' Whilst I totally agree with the rejection of Site D this highlights my concerns about the obvious inconsistencies between how each site was (impartially?) considered, especially SITE E.

There are further obvious inconsistencies in the 'new' (post Regulation 14) version of Appendix 2-5, especially in respect of Site E. There are now additional negative comments against every other site based on those received about it during the Regulation 14 consultation, either from residents or statutory bodies consulted (Environmental Agency, DCC etc). But there are NONE listed against Site E, even though I submitted many critical comments about it (see Appendix C!) as did other respondents, WDBC and Historic England. Why were these all left out or not even referred to?

The MACK site assessment (Appendix 2-5) states on page 5, in reference to Milton Abbot, that 'There is limited capacity at the primary school and the school is not capable of expansion.' In Q141 I asked the MACK Team if this is their conclusion how can an additional 20 houses be justified in Milton Abbot AND at the same time it is given as a potential reason for why additional houses at some of the Chillaton sites CANNOT be justified! You can't have it both ways. Unfortunately, they failed to answer my question saying they were unable to identify which document I was referring to! Whilst I did incorrectly say it may have been an AECOM document it is hard to understand how the MACK Team failed to recognise the wording of their own (Appendix 2-5) site assessment document?!

App C Q 127 to Q131 – Site E (according to the AECOM report on page 72) is NOT a brownfield site! Although the MACK Team continue to infer it is (see Q127) AECOM clearly classify it as greenfield. Incredibly the Mack team (Q131) state that 20 houses in a small rural village are an improvement on a rural farm!! It is another indication of the clear inconsistency in the Regulation 14 draft plan (pages 59-61) when EVERY other potential site is referred to as so many hectares '...of agricultural land...' (my underline) and Site E is just 'land' ! Worse, it gives the impression the site is JUST '...areas of

hardstanding, farm buildings and storage buildings...' – conveniently omitting any reference to the significant pasture (agricultural???) land!

App C Q6 page 23/24 – the Mack Team admit the source of the 'opinion' about how the overall appearance of the farm site detracts from the rural setting of the village is from AECOM. But in their answer to Q6 the MACK Team just repeat the AECOM phrase and do not give ANY explanation for how this conclusion was reached or the basis for it! AECOM also says views into this site from adjacent heritage sites can be only enhanced by the development! How is this possible?! And how have they measured this to reach this conclusion? We have been given NO clarification of this.

The SEA says you should avoid building on agricultural land.

The AECOM report infers only the western part of the site should be redeveloped but the MACK Team (App C page 24 Q5) admits there is effectively no control over where the developer will build. (see also MACK Team answers to Q78 and 79 page 63).

Historic England in their response (see App C, page 152, comment 103 sub para 3) highlights concerns about the absence of clear methodology for the outcomes and recommendations (for ALL sites) in the AECOM report and whether this provides sufficient evidence for conformity with the NPPF.

In addition, they (page 154 sub para 7) are very critical about the AECOM evaluation of Site E:

Site E. The AECOM report on page 17 (I think they mean page 25) and in Appendix A states that development is not likely to cause harm to designated heritage assets or their settings due to the relative distance of the site from the designations within the village and visual screening. But, as indicated above, distance and screening are not in themselves automatically appropriate indicators of potential harm and the means by which these conclusions have been arrived at are not clear. Reference is also made to various undesignated heritage assets on the basis that some impact and/or mitigation is possible but again this conclusion as an acceptable outcome is not substantiated. Appendix 2-5 in section 2-6 asserts that views into the site from adjacent heritage sites can only be enhanced by this development but again this is not substantiated with evidence.

The AECOM report is inconsistent on Heritage impact – they say Site E has 'limited or no impact or no requirement for mitigation' (top of page 72) in respect of causing harm to a designated heritage asset or its setting. But when looking to the village from the west this site is right in the foreground of the Grade 1 listed church! The WDBC Conservation Officer (comment 104, page 155 App C) effectively confirms this!

Even the latest Regulation 15 draft plan (para 9.12.2) confirms SITE E is in a '....prominent location' ! And the MACK Site Assessment Appendix 2-5 (page 5) clearly states. 'The western edge of Milton Abbot sits with the Tamar Valley AONB' !

I highlighted a number of inconsistencies in the AECOM report between different sites and many of their comments about SITE E which for some reason were completely left out of the Regulation 14 draft plan. In respect of Site E, these included AECOM comments about the medieval field system, the impact of the development on the old Methodist Chapel and the residents in Lutyens Fold and Higher Edgcombe Lane, the impact on the Tamar Valley Discovery Trail and surface water issues. I asked for them to be all taken into account but my comments were totally ignored.

Finally, policy 9-6 (page 75) of the Regulation 15 draft plan indicates at least 30% of the houses built on Site E will be affordable housing – there is NO legal guarantee this will happen. Additionally, it states that if Site E is developed there will be a list of conditions ‘...generally agreed with the landowner..’ With NO legal weight at all, what does ‘generally agreed’ actually mean? And doesn’t the inclusion of the Williams/Hitchcock email of 19 May 2021 in the submission demonstrate a total disregard for the fact the local community has not even actually chosen or voted on Site E yet? It is just another example of the unacceptable presumptions that have been made throughout the draft plan process. I also note in the Williams/Hitchcock email the landowner wants the option to add four bedroomed houses later, probably through a ‘variation of condition’ application? Not surprisingly, the MACK Team doesn’t include the reference to four bedroomed houses in the final 9-6 draft. And it is clear the landowner does not want Milton Abbot Parish Council to have any control over any ‘Masterplan’ for the site, contrary to any impression the draft plan might give.

Sadly is this more proof of the unfair and inconsistent way that Site E was chosen?

And how does this impact on the validity of the ‘86% approval’ response rate?

Validity of Regulation 14 consultation response

There have been many references to the 86% ‘approval’ rate of this draft but this should be considered in the context of the draft plan’s content having some potential inaccuracies? Does this make the inference that AECOM have ‘...done their job to the satisfaction of the local community’ somewhat groundless if achieved under a misapprehension?

App C page 108/9, answer to comment 73 – is another example of the MACK Team stating the ‘overwhelming majority of responses’ (to the Regulation 14 consultation) ‘recognise the need for affordable housing and the rationale underpinning the proposal for a single development on the one site’. Residents effectively had little alternative as this ‘rationale’ was essentially what the Regulation 14 draft plan ‘told’ them! There was NO documented proof published of the community support that existed BEFORE the Regulation 14 consultation.

The Regulation 14 draft plan was heavily ‘marketed’ in Milton Abbot as a method of fighting an individual planning application (0016/20/OPA). In fact many residents comments posted clearly stated their intention to approve a plan that would effectively stop this application. This is not the primary purpose of a neighbourhood plan and there was clear WDBC advice at the time that a planning application and neighbourhood plan should be considered separate issues.

Many residents clearly saw the Mack plan as a way of stopping application 0016/20/OPA; they also obviously believed (due to the wording on the plan) the new houses would come with (S106) ‘benefits’ for the village, when this was/is not the case.

The end of the Regulation 14 consultation coincided with the planning committee’s consideration of App 0016/20/OPA. In order to influence this meeting (and put ‘pressure’ on councillors to refuse the application?), there was an increasingly assertive public encouragement (including from the MACK Team) to all residents to support the draft plan (with chosen alternative sites to this application) in their Regulation 14 consultation response. Residents were asked to get others to do so too.

In fact on the Milton About Village (Facebook) Hub residents were actually 'guided' on what to say in their response to the Regulation 14 consultation!

Section 106 Agreement

Unfortunately the wording of some sections of the Regulation 14 draft plan gave many residents the impression that Milton Abbot would benefit significantly from S106 revenue and that this would provide new facilities in the village. This is just not correct.

There were (Regulation 14 respondees) who were pleased the new development will bring '...some tangible return to the community' indicating they have believed the Regulation 14 inferences. Some believe (even in Chillaton) the current plan may increase the chance of a new shop – sadly there is no historical evidence at all the plan will do this. There is a lot of evidence the draft plan has unrealistically raised residents expectations of what supporting it can achieve.

App C page 158 - WDBC confirm in their response to the Regulation 14 consultation that S106 funding agreements are only to '...offset the unacceptable impacts of development' and '...cannot be seen as a funding mechanism to finance a wish list.' WDBC also make clear that given the (MACK Team?) desire to maximise affordable housing opportunities (and therefore prioritise any S106 money?) then the list (5504 Regulation 14 draft plan) is '...somewhat unrealistic.' If I understand their advice correctly, WDBC then appear to recommend the MACK Team review the relevant legislation and undertake an assessment that produces a more (realistic?) indication of what S106 funding is available based on the proposed new developments.

Despite all this, in the revised Regulation 15 draft plan (7.5.4. page 43) there is STILL a list of possible S106 funded facilities/measures that may be provided, including a '...new community centre for all ages within the development..' If you look at the MACK Team's response to me (App C page 70 Q94) they told me the (Regulation 14) draft plan does not mention a new community centre.

The Regulation 15 draft pan (Para 9.8.7. page 59) STILL gives the impression a community building was desired by the community (where is the recorded proof?) and this is despite comments from WDBC about the unrealistic nature of this proposal.

App C page 69, Q and A 91 - the MACK Team say Section 106 agreements are '...to help make new home schemes more attractive to communities...' Strictly speaking, this is not the purpose of S106 agreements; I understand they are actually used to mitigate the impact of a new development on the local community and ensure a planning application that would not otherwise be approved is acceptable.

App C page 70 Q and A 95 – I asked what the new community facilities are (7308 Regulation 14 draft plan) and was told by the MACK Team (see Appendix 2-4 para 6.1.22) this means equipped play area, community green space or allotments, presumably on or next to the new development. So why the reference to a new community centre? This is giving residents a totally false impression!

The MACK team do actually confirm (App C page 75 Q120) that (ONLY) '...affordable housing will be the principal beneficiary...' of any S106 developer contributions in Milton Abbot. Does this not negate the whole section on additional community funding? (section 5.5 Regulation 14 draft, section 7.5 Regulation 15 draft). Unfortunately, just saying (See App C page 75 Q121) this section '....covers the potential for exploiting S106 funding' is not a definitive guarantee for the village.

App C Page 148 – The MACK Team admit any S106 ‘benefits’ are limited to Milton Abbot but that community actions should ‘...bring equal (my underline) benefit to Chillaton’ There is no specific evidence at all provided anywhere to how this would be achieved equally for Chillaton.

Green spaces and village boundary changes

App C page 68, Q and A 84-88 – there is still no documented evidence that an overwhelming number of residents want new green spaces on new developments. If these statements are put into the draft plan they MUST be supported with written evidence to PROVE them. This statement is repeated at 4.6.3.1 (page 24) of the Regulation 15 draft plan, the source for this is given as the 2017 Residents Survey but again, NO numerical data is provided.

Para 7.3.3. and Policy 7-2 (page 41) of the Regulation 15 draft seem to reflect the desire for new community or recreation facilities in Milton Abbot. In App C (page 18) the MACK Team state there is very little in the way of community facilities in the MACK Plan area in response to an offer of help from WDBC to help with a study to identify any shortfall in local recreational provision.

Why do we need ‘new’ outdoor sport and children and young peoples facilities? (see 7.5.4). It is a shame my suggestion about using the MUGA at Milton Abbot School was ignored by the MACK Team. Is there any way that WDBC could help to negotiate with Milton Abbot school to secure use of the school MUGA for use by local residents?

Natural England (Appendix C page 111 comment 74) said further evidence must be given to explain the boundary change, its position and to justify inclusion of undeveloped land within the new boundary. In response the MACK Team have now included a not-seen-before set of criteria (9.11.3) and Policy 9-5 (Page 66) in the Regulation 15 draft plan. This states (second para): “*The specific circumstance of Milton Abbot merit the additional criterion that the development contributes to the consolidation of the village by exploiting predominately brownfield sites if possible.*” Even if you could argue (I don’t) overlooking the introduction of a totally new criterion, Site E is NOT A BROWNFIELD SITE. Worse, paragraph three of Policy 9-5 seeks to ensure the new boundary will prevent future development on greenfield sites, which Site E CURRENTLY IS!

The Regulation 15 draft plan (see 9.11.4) infers there was no adverse comments on the proposed new boundary at the Regulation 14 stage. This is not correct. I asked a whole series of questions about the validity of the boundary changes (App C page 59/60, Q51 to Q59 and page 103) without any clear satisfactory answer.

App C page 60 Q and A 51 - the MACK Team said it was WDBC who told them to extend the Milton Abbot village boundary to incorporate Site E. Is this appropriate when no definite site had been chosen by residents? This is a slightly ‘chicken and egg’ scenario. The new boundary makes it more likely that Site E would be chosen but surely it should NOT be extended until a final decision on Site E?

Also, why does the proposed boundary ‘spike’ above Summerfield House if the boundary, according to the MACK Team, is supposed to be uniformed?

Sustainable villages

Every time there is a resident suggestion to 'share' development (App C page 132, comment 80) between Milton Abbot and Chillaton any alternative sites in Chillaton are dismissed because of the sustainability designations. I am sure there are Chillaton residents who regard their village as just as 'sustainable' as Milton Abbot (App C, page 148) and therefore want to secure its growth and future. It is wrong to just dismiss comments about sustainability designations between the two villages simply as '...a matter for WDBC'.

The revised MACK Site Assessment Appendix 2-5 (page 28 2nd para) now seems to indicate that Chillaton residents were essentially 50/50 for/against development in the village. And the MACK Team do not want to prevent potential development in Chillaton if it meets the identified needs of the broader community!

Despite this, the Mack Team continually state there are major differences between the existing facilities in the two villages. In a number of their response in App C (one example is page 62 Q and A 66) they state Milton Abbot has a school, village hall, church and visiting post office while 'Chillaton has none of these'.

If you visit Chillatton.net, the official village website, this indicates a church, St Mary the Virgin, at Marystow, which is '...within walking distance of the village centre...' and a visiting post office one day a week, the same as Milton Abbot.

Why is there no listing of St Mary The Virgin at Marystow on page 41 of the Regulation 15 draft plan? The Parish Council uses the church hall for its meetings and page 5 of the Housing Needs Survey confirms Chillaton has a parish church! It is also slightly convenient for the MACK Team to say Chillaton has no school when children from Chillaton attend Milton Abbot School and have done for years. AECOM kept repeating that limited primary school capacity was a reason why proposed sites were unsuitable in Chillaton but the SAME school does not preclude 20 new houses in Milton Abbot! And several times the MACK Team states there is no pub in Chillaton but then the Regulation 15 draft plan (page 41) indicates it is '...currently closed but still registered as a business.'

Finally, I did ask the MACK Team (App C page 24 Q11) about the views of WDBC on the possible effect of the new White Paper – Planning for the Future on the MACK Plan. This could influence the planning system in terms of sustainable village designations. There was no response from the MACK Team.

There is no existing national formula/evidence (that has been published) which proves building additional houses in any village will somehow bring back its lost facilities or guarantee new ones (the MACK Team agrees with this – see App C page 74, Q119)

App C page 59/60, Q60-61 – I asked if it is fair to have residents from the whole MACK plan area vote on a substantial housing development that only affects ONE village? The only answer from the MACK Team was to say the draft plan was also to introduce policies on mobile phone coverage and protecting heritage and this would also affect the rest of the MACK Plan. This is hardly the same as one village having twenty new houses built in it! Their assertion the MACK Plan (App C page 62, Q and A 69) 'applies fairly' to the whole area is obviously not correct.

App C Page 118 answer to comment 77 – suddenly residents comments or preferences from the 2017 survey are no longer relevant. Throughout the whole MACK Plan process to date we have been continually told that much of its content reflects the results of this survey! Now it is only comments submitted in the Regulation 14 consultation that ‘...are pertinent’ .

According to the MACK Team, ALL previous respondents said they want to improve the sustainability of their village to secure its future, improve local facilities and have more affordable homes.

As I said earlier, an opportunity to possibly achieve all this is available in respect of C Site A; a 66% ratio for affordable homes is an amazing ‘return’ from any development. This ‘allows’ the potential for smaller scale developments in Milton Abbot (five houses on Site C or E?) and Chillaton (seven houses on Site B?); this lower scale of housing (on these sites) actually has documented support, either from residents, earlier site assessments (SHLAA) and arguably even AECOM and the MACK Team!

I cannot understand why a possible solution that would more than fulfil the original expectations of ALL local residents is just being overlooked. Everyone in the MACK Plan area should at least be allowed the opportunity – given the full facts – to (re?)consider their decision about the draft MACK Plan?

Conclusion

No one could dispute the fundamental merits of a local neighbourhood plan in trying to agree where future development should be through local community consultation; you also cannot fail to respect the majority wishes of the local community in any final referendum on the plan. But to ensure a equitable outcome everything in the process must be done in a correct and fair way.

Please consider whether, on this occasion, the MACK Team should have:

Included published factual evidence of all apparent community support for the draft plan contents;

Demonstrated ALL possible development sites were assessed objectively in an unbiased, independent AND consistent way;

Ensured the proposed benefits in the plan were presented factually, so residents clearly understood how realistic (or not) the chances were of these being actually achieved.

Sadly it is now probably impractical to rerun the entire neighbourhood plan process. But perhaps WDBC and/or the independent examiner could at least instruct the MACK Team to redraft the MACK Plan where appropriate to publish more factual information on what actual local support there is for its proposals, how each site was actually assessed and the reality (in terms of benefits) of what residents can expect from its outcome.

This should be done BEFORE residents in the MACK Plan area are asked to vote in any binding referendum so they have ALL the relevant facts before making their final decision.

A Clarkson

24 September 2021