

To WDBC/Independent Examiner

REVISED MACKPLAN (REGULATION 16 CONSULTATION)

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

Can you please also consider the further relevant points below:

There are comments 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.

When the availability (or perceived lack of) affordable homes in the area appears to underpin everything in the MACK Plan I noticed that my reference to over 300 new affordable homes in Tavistock was ignored by the Mack Team. Surely this should have an impact on the MACK Plan.

AECOM clearly state Site E is NOT a brownfield site! Although the MACK Team continue to infer it is. AECOM clearly classify it as greenfield. Incredibly the Mack team 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 when EVERY other potential site is referred to as so many hectares '....of agricultural land...' and Site E is just 'land' ! It gives the false impression that the site is JUST '....areas of hardstanding, farm buildings and storage buildings...' – conveniently leaving out any mention of all the lovely pasture (agricultural???) land!

The Mack Team admit it was AECOM who said the overall appearance of the farm site detracts from the rural setting of the village. 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 could this be 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 admits there is effectively no control over where the developer will build.

Historic England in their reply to the Regulation 14 consultation had 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 were 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’ 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 seems to agree with this. Even the latest Regulation 15 draft plan says SITE E is in a ‘...prominent location’. And the MACK Site Assessment Appendix 2-5 says ‘The western edge of Milton Abbot sits within the Tamar Valley AONB’ !

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 and could have influenced many to agree with the draft MACK Plan.

Thank you.

J Clarkson

25 September 2021