

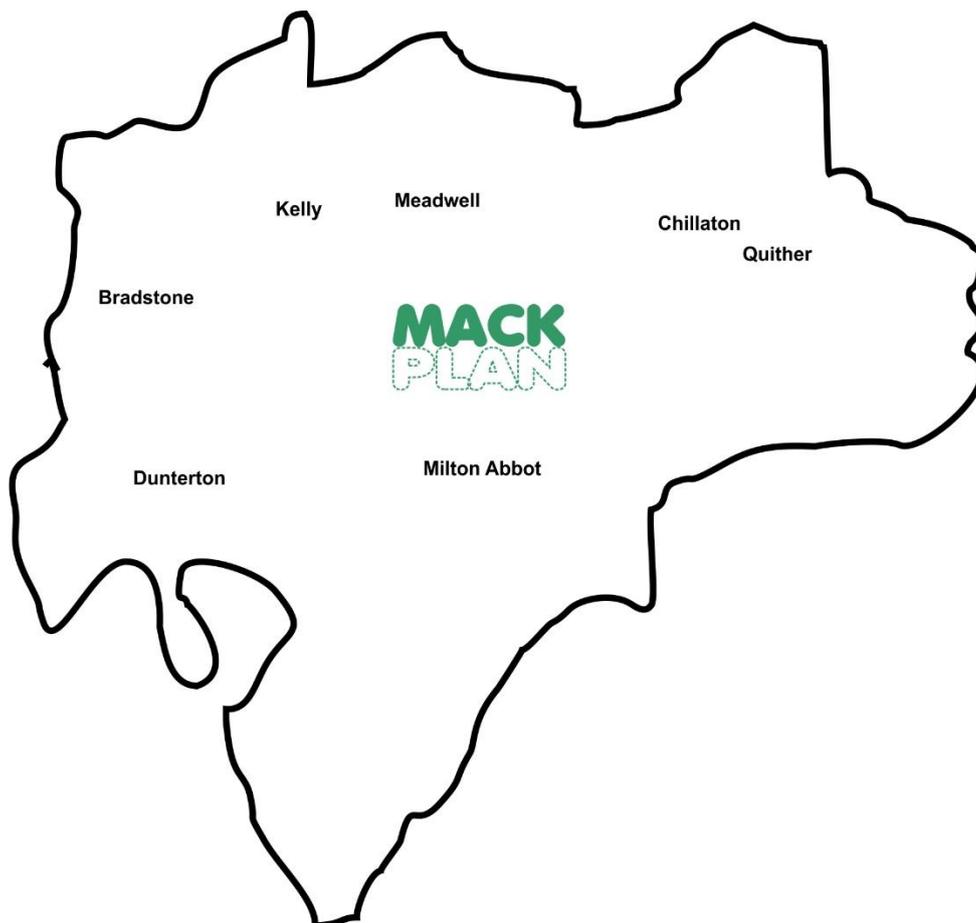
Milton Abbot, Chillaton and Kelly Neighbourhood Plan

Bradstone: Chillaton: Dunterton: Kelly: Meadwell: Milton Abbot: Quither



Text in red relates to assumptions about decisions not yet taken or activities not yet carried out.

SUPPORTING EVIDENCE



1. A firm basis for MACKPlan

1.1 If asked, most people will have opinions about what ‘the facts’ are about where they live and also have views about what is good or bad, what needs to be conserved or what should be done away with. Whilst such qualitative judgements are important and have been taken into account in preparing MACKPlan, it is essential that every element of the plan is based on hard data, not on assumptions or unsupported theories.

1.2 The policies, development proposals and constraints in MACKPlan also have to be in accord with national and borough-wide planning policies and their compliance must be clearly demonstrated.

1.3 The outcome should be that MACKPlan adequately reflects the circumstances of the locality and the challenges and opportunities it is likely to face in the future. It should also provide a robust, defensible, context for the determination of applications for planning permission within its area.

1.4 Therefore, this document sets out relevant supporting evidence to illustrate various physical and social aspects of the MACKPlan area, together with the national and local planning policies/guidance concerning those issues.

1.5 As the plan will form part of the process of achieving appropriate sustainable development within the locality over time, it must also take account of relevant official forecasts of future demand, together with the aspirations and concerns of local residents. Following an initial on-line survey to help determine its scope, **a questionnaire was sent to every household in the plan area and analyses of the outcome of that survey are included in the supporting evidence, to help to quantify future demand and expectations.**

1.6 The outcome of that consultation process and the opportunities and constraints on development contained in existing and emerging Local Plans do not create a situation where proactive action is needed in respect of the development of a specific site or sites. Therefore, no application is being made for a Neighbourhood Development Order. However, the Neighbourhood Development Plan does contain proposals to deliver the housing development stipulated by the Local Planning Authority across a number of identified sites, that will be subject to the normal planning process.

1.7 Therefore, the procedures and other activities required to be carried out to achieve compliance with guidance and regulations concerning neighbourhood planning have been confined to those relating to the preparation of Neighbourhood Plans, not Neighbourhood Orders.

1.8 *A neighbourhood plan must set out the period for which it is to have effect (section 38B(1)(a) of the Planning and Compulsory Purchase Act 2004). Neighbourhood plan policies remain in force until the plan policy is replaced.¹*

It makes sense for MACKPlan to cover the same period of time as the Borough-wide local plan. The Joint Local Plan now being produced will have effect until 2031 and MACKPlan is intended to cover the same period.

2. The context in which MACKPlan has been produced

2.1 PPG 41 Para 40 states: *While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no ‘tick box’ list of evidence required for neighbourhood*

¹ Planning Practice Guidance [PPG] 41 Para 84

planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.

Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.

In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.

2.2 PPG 41 Para 45 states that *A qualifying body may wish to consider what infrastructure needs to be provided in their neighbourhood area alongside development such as homes, shops or offices. Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way.*

2.3 Para 70 of PPG 41 sets out which national policies are relevant to a neighbourhood plan, as follows:

Para. 16 of the National Planning Policy Framework [NPPF] is clear that those producing neighbourhood plans or Orders should support the strategic development needs set out in Local Plans, including policies for housing and economic development. Qualifying bodies should plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan. More specifically paragraph 184 of the NPPF states that neighbourhood plans and Orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

The content of a draft neighbourhood plan or Order will dictate which additional national policy is or is not a relevant consideration to take into account. The basic condition allows qualifying bodies, the independent examiner and local planning authority to reach a view in those cases where different parts of national policy need to be balanced.

A qualifying body is advised to set out in its basic conditions statement how they have had regard to national policy and considered whether a particular policy is or is not relevant. A qualifying body is encouraged to set out the particular national policies that it has considered, and how the policies in a draft neighbourhood plan or the development proposals in an Order take account of national policy and advice.

At a meeting with neighbourhood planning teams on 8th March 2016, WDBC stated² that, in addition to the NPPF, neighbourhood plans should identify the main sources of written evidence, including:

- *WDBC Local Plan 2005*
- *WDBC Core Strategy 2011 – 2026*
- *WDBC draft Our Plan 2011 – 2031*
- *Devon County Council Local Transport Plan (LTP)*
- *Devon County Council Minerals & Waste Plans*

2.2 PPG 41 Para 65 states that *only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made.* There are additional conditions for a neighbourhood Order, but the basic conditions for a draft neighbourhood Plan are that:

² *Email from S. Packham WDBC 10/03/2016*

- a. *having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.*
- b. *the making of the neighbourhood plan contributes to the achievement of sustainable development.*
- c. *the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.*
- d. *the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.*
- e. *prescribed conditions are met in relation to the Plan and prescribed matters have been complied with in connection with the proposal for the Plan.*

Annexe ?? contains the Basic Conditions Statement demonstrating how MACKPLan achieves conformity with relevant national and local strategic planning policies and objectives. It also demonstrates why particular policies are, or are not, relevant.

Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them.³

Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- *the homes and jobs needed in the area;*
- *the provision of retail, leisure and other commercial development;*
- *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- *the provision of health, security, community and cultural infrastructure and other local facilities; and*
- *climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.⁴*

3. The Consultation Process

Before the formal pre-submission consultation takes place a qualifying body should be satisfied that it has a complete draft neighbourhood plan or Order. It is not appropriate to consult on individual policies for example. Where options have been considered as part of the neighbourhood planning process earlier engagement should be used to narrow and refine options. The document that is consulted on at the pre-submission stage should contain only the preferred approach.⁵

³ NPPF para 184

⁴ NPPF para 156

⁵ PPG 41 para 049

The Neighbourhood Planning (General) Regulations 2012 require a neighbourhood planning team to consult any of the consultation bodies set out in Schedule 1 to those Regulations whose interest it considers may be affected by the draft neighbourhood Plan or Order proposal.

That Schedule is shown in Annexe ??, duly annotated to identify which organisations **were consulted** and stating the reasons why the remainder were not contacted.

Consideration has been given to the need for additional publicity and consultation where European directives may apply and, in accordance with Para 51 of PPG 41, the advice of the local planning authority [WDBC] has been sought.

[Further advice needed on the requirement, if any, to carry out either a strategic environmental assessment or sustainability appraisals.]

4. The communities within the MACKPlan area

4.1 As its name suggests, there is no central 'neighbourhood' covered by MACKPlan. The plan comprises two administrative areas; that of Milton Abbot Grouped Parish Council and of Kelly Parish Meeting.

4.2 The Parish Council covers the villages of Chillaton and Milton Abbot, plus hamlets at Bradstone, Dunterton and Quither. The area of the Parish meeting includes the village of Kelly and the hamlet of Meadwell. 'Village' and 'hamlet' are used to give an idea of the relative scale of the communities concerned

4.3 Data from the 2011 Census is not available below parish level and at the time it was undertaken, Bradstone and Dunterton were not part of the area of the Parish Council or of the Parish Meeting.

4.4 To assemble data for the whole of the MACKPlan area, it is therefore necessary to combine figures for three components, MAC [Milton Abbot, Chillaton and relevant hamlets], Kelly and B&D [Bradstone & Dunterton], as shown in relevant analyses in this document. It is not possible to produce data from national statistics that relates to individual villages in the MACKPlan area.

4.5 Despite being a collection of separate small communities, there some sense of cohesion brought about by shared experiences, opportunities and challenges, given the common context for all of them; an attractive rural area, predominantly agricultural, with few local employment, shopping or leisure opportunities.

3. Key aspects of living in the MACKPlan area

Population

3.1 The attractiveness of much of the area of WDBC, as with other parts of the West Country, has resulted in a local population that has a higher than average proportion of elderly people and a lower number of adults likely to be working, or children, as shown below:

Area	Population	65+	%	18-64	%	0-17	%
MAC	787	129	16.4	492	62.5	166	21.1
Kelly	138	23	16.7	74	53.6	41	29.7

B&D	124	25	20.2	81	65.3	18	14.5
MACKPlan	1,049	177	16.9	647	61.7	225	21.4
WDBC			23.1		57.8		19.04
UK			16.4		62.3		21.4

3.2 However, the commonly held view in local rural communities that there are too many old people and not enough children is not supported by the evidence in the above data, as far as the MACKPlan area is concerned, which was in line with constituent age groups for the UK as a whole.

3.3 Nevertheless these percentages are based on relatively small numbers and therefore do not give grounds for complacency with regard to the need to encourage the development of viable local communities, with as balanced a population range as possible.

3.4 Inward and outward migration figures from 2011 to 2014 show an average of 3,290 people arriving in the WDBC area and 2,930 leaving. Whilst this net average inflow of 360 people a year seems relatively small, if their stay is long-term there is a considerable cumulative effect. The average age of people migrating within the UK is 19, so it is likely that many of them are students leaving and returning.⁷

3.5 However, if the higher than average proportion of elderly people in West Devon is reflected in the net migration figures, [**Can that be demonstrated?**] then demand is being created for additional homes and inflationary pressure is being put on the prices of existing properties.

Employment

3.6 Employment activities in the MAC area in which more than 20 people were engaged in 2011, were:

Motor trades	66	Construction	34
Health and social services	52	Accommodation	32
Education	50	Manufacturing	31
Agriculture/forestry	41	Professional/scientific/technical	23

It seems reasonable to conclude that employment patterns would be similar in the other two parts of the MACKPlan area as there are no significant employment centres in those localities.⁸

3.7 The number of people who were unemployed, i.e. not students, retired or at home looking after other family members was 20 in 2011, or 2.6% of the population aged between 16-64. The national average in 2011 was 7.7% and in 2015 was 5.4%.⁹ That reduction in 2015 to a seven-year low does not suggest that current unemployment figures in the MACKPlan area will have increased.

3.8 The following table shows that in 2011, the MACKPlan area had a higher percentage of residents in work than Borough-wide or nationally. Self-employment was almost three times the national average.

⁶ 2011 Census Age Structure [KS102EW] Updated 30/01/2013 – Source ONS

⁷ Source ONS: Internal migration estimates

⁸ Source ONS: - Industry 2011 [KS605EW]

⁹ **Source?**

Area	16-64	In work		Employed [Part-time]		Employed [Full-time]		Self-employed	
MAC	590	413	70.0%	92	15.6%	172	29.1%	149	25.2%
Kelly	93	68	73.1%	16	17.2%	21	22.5%	31	33.3%
B&D	99	76	76.8%	14	14.1%	31	31.3%	31	31.3%
MACKPlan	782	557	71.2%	122	15.6%	224	28.6%	211	27%
WDDB			62.9%		15.2%		31.1%		16.6%
UK			62.1%		13.7%		38.6%		9.8%

10

3.9 The A30 trunk road can be accessed easily from Chillaton and Milton Abbot, making it possible to commute to local towns or a regional centre like Exeter [38 miles from Chillaton, for example]. In 2004, the average distance travelled to work by residents in MAC was 25.32 miles. No later data is available, but as no significant employment opportunities have arisen in the local area since then, this data still appears relevant.¹¹

Shopping

Neither Chillaton or Milton Abbot, the two largest settlements in the plan area, have been able to retain their village shops, both of which have closed in the past five years and been granted planning permission for residential use. Three local towns; Tavistock, Launceston and Okehampton meet most retail needs and there are regional centres at Exeter and Plymouth. All major supermarkets provide home delivery services to the plan area.

Recreation, entertainment and exercise

Milton Abbot has a village hall and a pub. Chillaton has a pub that is currently closed awaiting restoration and has been registered as an Asset of Community Value. Kelly village hall is situated at Meadwell. Immediately adjacent to the MACKPlan area is the Church hall at Marystowe Church, which is used by Chillaton residents.

There are no other buildings used for recreational or leisure purposes in the MACKPlan area, but there are other facilities such as local football pitches and public footpaths. **[needs more work]**

Social deprivation

3.10 *Dimensions of deprivation* are indicators based on four selected household characteristics:

- Employment (any member of a household not a full-time student is either unemployed or long-term sick);
- Education (no person in the household has at least level 2 education, and no person aged 16-18 is a full-time student);
- Health and disability (any person in the household has general health 'bad or very bad' or has a long term health problem.);
- Housing (Household's accommodation is either overcrowded, with an occupancy rating -1 or less, or is in a shared dwelling, or has no central heating).

The following table shows that the degree to which dimensions of deprivation were present in the MACKPlan area at the time of the 2011 census was broadly in line with Borough and national circumstances:

¹⁰ 2011 Census Economic Activity [QS601EW/KS601EW] Updated 30/01/2013 – Source ONS

¹¹ 2001 Parish Profile – Work and Qualifications 2001 Updated 28/04/2004 – Source ONS

Area	Households	None		One		Two		Three		Four	
MAC	307	145		113		34		13		2	
Kelly	47	22		19		5		1		0	
B&D	45	20		20		5		0		0	
MACKPlan	399	187	47%	152	38%	44	11%	14	3%	2	1%
WDBC			45%		33%		17%		3%		3%
UK			42%		32%		19%		5%		5%

¹²

Transport

Education

There is one primary school in the MACKPlan area, at Milton Abbot. However, some children in the area attend another primary school at Lewdown, which is four miles from Chillaton.

Secondary education is mainly provided by Tavistock Community College.

Private primary and secondary schools are located in Tavistock.

Both primary and secondary school pupils can use school transport from various points within the Plan area.

[Requires further detail, including an analysis of future demand and supply.]

4. Housing need

It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly set out in the National Planning Policy Framework, in the [core planning principles](#), the section on [supporting a prosperous rural economy](#) and the section on [housing](#).

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development [in rural areas](#) – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence. A neighbourhood plan [can allocate additional sites to those in a Local Plan](#) where this is supported by evidence to demonstrate need above that identified in the Local Plan and the plan proposal meets the [basic conditions](#).

¹² 2011 Census Households by Deprivation Dimensions [QS119EW] – Source ONS

The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas ¹³

4.1 The 2011 census showed that only two dwellings out of a total of 399 in the MACKPlan area were shared by more than one household. Of the other 397 homes, 53% were detached, 30% semi-detached, 13% terraced and 3% flats. There were also three permanently occupied caravans. ¹⁴

4.2 In 2013, the average price of property in the WDBC area was £219,131 and the lower quartile average price was £170,000, which was 10.46 times the average earnings of Borough residents. [Add info on local market in Chillaton and Milton Abbot.] ¹⁵

4.3 The following analysis of ownership and tenure made in 2011 shows that social rented housing is significantly under-represented in the MACKPlan area.

Area	Households	Owned		Shared ownership		Social rented		Private rented		Rent free	
MAC	307	231		1		12		55		8	
Kelly	47	38		0		0		9		0	
B&D	45	35		0		1		8		1	
MACKPlan	399	304	76%	1	0%	13	3%	72	18%	9	2%
WDBC			73%		1%		10%		15%		1%
UK			63%		1%		18%		17%		1%

¹⁶

4.5 WDBC has now decided participate in the production of a Joint Local Plan, developed in conjunction with South Hams District Council and Plymouth Council. WDBC had been in the process of producing a Borough-wide local plan - *Our Plan*. This contained proposals for the development of a minimum of 20 new homes in the village of Milton Abbot. Several potential sites in that village had been put forward for consideration, following a 'Call for land' by WDBC. Milton Abbot Grouped Parish Council has submitted its views on the suitability of these sites and has formally objected to the proposals in *Our Plan*, as far as the number of new homes is concerned. The Parish Council considers that 15 new homes would be more appropriate [state reasons and Minute reference]. Consideration of that objection has been delayed as a result of the decision to change the basis on which a local plan is being produced.

4.6 Those potential development sites are considered in detail in Section **????** below. Regardless of the scale of development that MACKPlan is eventually required to deliver, it needs to take account of relevant national and local policies regarding future housing provision, projections of demographic change, and existing and predicted demand for specific types of accommodation both in the MACKPlan area and in any other catchment deemed appropriate by WDBC's affordable homes policies. These issues are addressed below.

¹³ PPG Rural Housing Para 001

¹⁴ Source ONS: - Accommodation type - Households 2011 [QS402EW]

¹⁵ Source WDBC Area Profile

¹⁶ 2011 Census Tenure [KS402EW] – Source ONS

4.8 Demographic changes:

*The retired population will increase by 56.0% by 2026. There is an inextricable link between ageing and disability and 62% with a support need are over the age of 60. Around 74% of these households contain a person with a walking difficulty.*¹⁷

*Primarily, the projections show a notable uplift in single person and couple households with this driven in significant part by the increasing number of older person households. The analysis suggests that there may be a high demand for smaller properties suitable for meeting the needs of older person households within the authority. Under the Employment-led scenario the growth in family households, aged 35 – 44 in particular is relatively significant, suggested a sustained demand under this scenario for traditional family housing (3 and 4 bedroom), recognising that moderate and larger properties represent the aspirations for many households of different ages.*¹⁸

*In addition to older person households, the projections also indicate that in order to maintain a level of working age population to match employment opportunities there will be a sustained need for family housing within the authority. • Specifically, in terms of affordable housing the analysis indicates that there will be a high demand for smaller properties, 1 – 2 bed, with need for this size of property making up 74% of total need. Importantly, however, the lower levels of turnover in larger properties also suggests that in order to address future need and the current backlog new larger affordable properties will also be required.*¹⁹

4.9 WDBC's estimate of current and predicted future demand for affordable housing in the MACKPlan area:

Data needed from WDBC

4.9 Application of affordable homes catchment policies

Info needed from WDBC

4.10 Analysis of Local Housing Needs Assessment:

The questionnaire sent to every household in the MACKPlan area included a section where residents were asked to consider their likely future housing needs over the next five years. It sought information regarding:

1. the current mix of home-ownership and tenure in the MACKPlan area
2. the ages and employment status of those who live here
3. their likely aspirations as far as housing is concerned
4. particular pressures on accommodation, such as growing infirmity, more than one adult generation in the same property, etc.

Anyone concluding that they might be deemed to be in need of affordable housing was then asked to make contact with ??? for further analysis and possible assistance.

The following table shows the potential demand identified from that survey and the type and quantity of new homes that would be required to meet that need.

¹⁷ West Devon Housing Market and Needs Assessment 2006

¹⁸ West Devon Strategic Housing Market Needs Assessment 2013

¹⁹ West Devon Strategic Housing Market Needs Assessment 2013

4.11 Overall assessment of demand for new homes in the MACKPlan area

Taking all the above factors into account, the following table illustrates the potential demand for new homes in the MACKPlan area during the life of the plan [2017 – 2031]

5. The physical environment of the MACKPlan area

The landscape

The built environment

Listed buildings

6. Sustainability

....all plan-making and decision-taking should help to achieve sustainable development. A qualifying body must demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).

In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions. There is no legal requirement for a neighbourhood plan to have a [sustainability appraisal](#). However, qualifying bodies may find this a useful approach for demonstrating how their draft plan or order meets the basic condition. Material produced as part of the Sustainability Appraisal of the [Local Plan](#) may be relevant to a neighbourhood plan. ²⁰

Assess the potential for sustainable development in the light of local facilities, WDBC's assessment and the requirements of the NPPF.

Potential development sites

Can a neighbourhood plan allocate sites for development?

A neighbourhood plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. PPG 41 Para 042

WDBC carried out a 'Call for Land' in 20??, resulting in the identification of ?? potential sites with the MACKPlan area. A further request to identify potential sites was included in the household questionnaire and in consultations with relevant interested parties. Annexe ?? contains an analysis

²⁰ PPG 41 Para 072

of each site, taking into account the views of WDBC, MAGPC and those put forward by local residents during specific consultation exercises about the development proposals concerned.

The Neighbourhood Planning (General) Regulations 2012 – Schedule 1

Neighbourhood development plans

1. For the purposes of regulations 14 and 16, a “consultation body” means—

- (a) where the local planning authority is a London borough council, the Mayor of London; **Not applicable**
- (b) a local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority; **YES**
- (c) the Coal Authority(1); **Not applicable**
- (d) the Homes and Communities Agency(2); **YES**
- (e) Natural England(3); **YES**
- (f) the Environment Agency(4); **YES**
- (g) the Historic Buildings and Monuments Commission for England (known as English Heritage)(5); **YES**
- (h) Network Rail Infrastructure Limited (company number 2904587); **Not applicable**
- (i) the Highways Agency; **YES**
- (j) the Marine Management Organisation(6); **Not applicable**
- (k) any person—
 - (i) to whom the electronic communications code applies by virtue of a direction given under section 106(3)(a) of the Communications Act 2003; and
 - (ii) who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority; **YES**
- (l) where it exercises functions in any part of the neighbourhood area—
 - (i) a Primary Care Trust established under section 18 of the National Health Service Act 2006(7) or continued in existence by virtue of that section; **YES**
 - (ii) a person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989(8); **???**
 - (iii) a person to whom a licence has been granted under section 7(2) of the Gas Act 1986(9); **???**
 - (iv) a sewerage undertaker; and **YES**
 - (v) a water undertaker; **YES**
- (m) voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area; **YES**
- (n) bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area; **YES**
- (o) bodies which represent the interests of different religious groups in the neighbourhood area; **YES**
- (p) bodies which represent the interests of persons carrying on business in the neighbourhood area; and **YES**
- (q) bodies which represent the interests of disabled persons in the neighbourhood area. **YES**