Transition Tavistock Comments on Planning Application 1203/24/OPA

(Tilia Homes, Land off Plymouth Road)

INTRODUCTION

We are a volunteer run community group working towards a sustainable future for the local area. More information about us is on www.transitiontavistock.org.uk

We OBJECT to both parts of the hybrid application, and urge the Council to reject it and invite the applicant to go back to the drawing board, engaging local residents in shaping a design fit for the future and taking the climate and nature crises seriously.

In the phrase quoted by the applicant from the NPPF, we agree development should “function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.” This proposal falls far short of this. While sympathetic to many of the concerns expressed by other objectors, we focus here on the neglect of key aspects of transport and energy planning.

SUMMARY OF REASONS FOR OBJECTION

- The application has been poorly presented for public consultation, with insufficient detail, missing evidence, over-reliance on assessments made over 4 years ago, and a derisory Statement of Community Involvement.
- While in a location allocated for development which "can enable safe, secure walking, cycling and public transport access to local services and amenities" as required in Joint Local Plan policy DEV29 this application does not do so . Rather than enable, the design prevents safe walkable connections to other neighbourhoods - including between the homes and employment area within the site itself. It is no wonder that Active Travel England, as a statutory consultee, has expressed multiple concerns.
- The applicant's claim that "pedestrian and cycle routes are well connected to the wider context of the site – providing clear and direct routes to local facilities and the wide cycle network" is unrealistic. A shopper walking to nearby Lidl and back would have to cross the A386 twice each way - frustrating both for them and for the traffic which has to stop. Children going to any of the Primary Schools have to cross the busy road with just an island for protection, on a short stretch of road to which this application, together with Little Orchard, would add 3 new junctions.
- The unnamed lane between this site and Little Orchard is unreachable, though it could be improved to become a safe traffic-free link to Brook Lane and NCN27, and so on to schools, the town centre and perhaps the station.
- We provide, below, more examples of ways in which this application fails the DEV29 requirement to "meet the need for walking, cycling and public transport connectivity both within the development and in the wider area alongside supporting place-shaping objectives".
- We explain, below, concerns about adherence to policy SPT2.11 "Explore opportunities for the use of renewable energy, including community energy schemes where appropriate, and reduce the use of energy through design and energy efficiency." For example, no solar panels

are proposed, and there is no sign of the proposed Air Source Heat Pumps in the exterior or interior views of the dwellings.
- Measures such as swift boxes and hedgehog-friendly fences are welcome - if they actually happen.

We recognise that this site is allocated for housing, but this does not justify acceptance of an unsuitable application which does not fit either planning policy or local aspirations. We urge the Council to reject this application and encourage the applicant to rethink, with proper local engagement, how this site could support truly sustainable living.

OVERALL

The application has been poorly presented for public consultation, with insufficient detail (eg spreadsheets that do not open), missing evidence (eg lighting strategy), over-reliance on assessments made over 4 years ago, despite the significantly changed context. The Statement of Community Involvement is derisory.

We recognise the need for new homes in Tavistock, and that this site is within area TTV17 allocated in the Joint Local Plan (JLP). However the applicant acknowledges that this application will bring the total number of homes on area TTV17 close to the 300 allocated for the whole, despite a significant section (presumably under different ownership) not being included. This results in a higher density of dwellings than the JLP anticipated, which contributes to some of the deficiencies described below.

Given the key location of this site, it could show how development can meet the aspirations of local people (as revealed, for example, in the proposed Neighbourhood Development Plan) for sustainable homes and businesses, fitting with local heritage and landscape, in a well-connected community which is responding to climate change. To develop it in line with this application would waste that opportunity.

TRANSPORT

As the applicant points out, the location of the site is suitable for sustainable transport, which is a key aim of planning policy. However, the plans fail to identify and address the barriers to residents using this. In our view it does not meet JLP Policy DEV29 requirement to "meet the need for walking, cycling and public transport connectivity both within the development and in the wider area alongside supporting place-shaping objectives". **We are pleased that Active Travel England is now involved as a statutory consultee, and urge Council officers and members to take the numerous concerns identified in their initial response very seriously.**

Walking and cycling within the site

The three areas of the site are disconnected. The employment area cannot be safety reached on foot or by cycle at all, let alone from the nearby homes. A connection suitable for pedestrians and cyclists could be fitted in. No justification for omitting this is given.

The area subject to the detailed planning application has 2 long cul de sacs whose ends could easily be linked by a surfaced path, but this is not done. The housing subject to outline planning application is only connected to the first set of housing by the principal road: traffic free connections should be added.

The footway design and width appear reasonable, though we do not have capacity to check it against accessibility guidance. The plans submitted have hardly any visualizations of the site, so it is difficult for non-specialists to identify the slopes involved and the degree to which this could deter

walking and wheeling. For example, the central green space with trees within the detailed site could be an attractive short cut and mingling space – but to be inclusive and accessible would need some form of footpath, possibly steps, and some seats.

Cycle storage within the dwellings is inadequate. In the apartment blocks it appears to be within an attached communal store with cycles having to be lifted onto hanging racks – not an inclusive design. For the houses without garages the presumption is that cycles will be stored in the small back gardens, which means they would have to be wheeled through living rooms and/or kitchens to reach the street.

Walking and cycling to and from the site.

The Design & Access statement says the site has "Potential for excellent pedestrian and cycle connections to local facilities and Tavistock town centre." We agree – so are shocked at the way the proposal not only fails to enable, but actually prevents safe walkable connections to other neighbourhoods, through an enclosed design with a single exit point directly onto the A386.

The plans recognise the need for a new crossing on Plymouth Road near the entrance, but just propose a refuge island. This is not a safe or suitable option. Every pedestrian leaving or entering the site – whatever their age, eyesight, or mobility, and whatever the time of day or the weather, will have to use that crossing, as there is only a short stretch of footway to be provided on the western site of Plymouth Road. Far from the claimed "safe and quick access to amenities and the town" there would be groups of parents with pushchairs, school children, dismounted cyclists and people catching a bus that could be already in sight, all trying to cross at one time. It is highly likely that any who have access to a car will use that rather than take the risk of dashing across a busy lane of traffic – and thus add needlessly and expensively to overall traffic congestion. **We think a Toucan crossing (ie with pedestrian operated traffic signals) is essential at any new crossing point.**

In addition, the site should incorporate a surfaced cyclable path along its whole eastern boundary, as close as practical to Plymouth Road, but separated from it by the hedge, and with a spur linked to an exit to the unnamed lane. This could in future be extended to form a continuous level path parallel to Plymouth Road by suitable conditions being placed on any future planning application for the plot on the corner of the lane (not covered by this application, but within TTV17) and for detailed planning permission for the employment land adjacent to Little Orchard. In the meantime, it would enable wheelchair access to the green spaces along the eastern boundary and a traffic free connection to the employment space within this application.

While the Transport Assessment correctly identifies many amenities which in principle are within reasonable walking distances, the need to cross a main road on every trip significantly adds to both the times and the difficulty, in the absence of a walkable route from the site along the western side of Plymouth Road. Moreover, willingness to walk depends on the attractiveness of the route. The assessment implies that Plymouth Road is a natural walking route to the town centre. However the pavement is narrow for a significant part of the distance, with traffic passing continually and, in wet weather, splashing pedestrians.

Cycling on this part of Plymouth Road at this point is regarded as too dangerous even by many experienced cyclists (and is resented by drivers). **It is certainly unsuitable as a route to school**. The exit from the development to Plymouth Road contains no provision for cyclists and is unlikely to be compliant with LTN 1/20 guidance on cycling infrastructure at junctions. It is not clear from the plans how cyclists are expected to connect with NCN27 from the development without joining and turning off a busy main road, or wheeling on the pavement which delays them and annoys pedestrians.

The short section of NCN 27 near Lidl, including the Toucan crossing, is already problematic, but the plans do not acknowledge this or propose any improvement. The issues include clarity of signing, the lack of any physical barrier between a shared use pavement and a busy main road, and sharp turns on a narrow path on the Bishopsmead side of the crossing.

While the public footpath to the south of the site is acknowledged and a diversion proposed where it crosses the employment land, this is of no benefit to residents of the new development. In its current form the path appears to get little use, despite linking to a quite country lane which leads up to moorland at its western end. This is because the current start point on Plymouth Road is can only be reached by crossing on a traffic island. The proposed re-routing does not address that problem. However if the employment land were given safe pedestrian access from the housing development, that would be a better end point for the footpath, and the existing island could potentially be removed. Rerouting of the footpath as it runs across the field above the employment area, along with access points from one or more of the southern boundaries of the housing area, would enable residents to use it for both short and long leisure walks.

The unnamed lane which runs along the northern border of the site could provide a safe cycling link to NCN27 north, which passes close to the back of the retail park, then via sports facilities to Tavistock College, Tavistock Primary School, the Meadows the town centre. The lane forms the southern boundary of the Little Orchard new development currently under construction (planning ref 3652/20/FUL), which, according to plans, has two exit points onto it for cyclists & pedestrians. It is therefore ideally placed to become an attractive connection point between two residential estates, with a traffic free connection to the west. This would require resurfacing of the lane, lighting to enable evening use, and highways orders to restrict vehicle use to that relating to the handful of premises on it, at low speed. The cost of this would be minor compared to the overall cost of the development. Application 3652/20/FUL appeared to envisage such a scheme, though it is not yet in place.

Given this context, it is incredible that the Tilia Homes proposal provides no access to the lane whatsoever. We think there should be at least two openings to it, suitable for pedestrians, cyclists and mobility scooters, and connected by a suitably surfaced walking & cycling path to the road network on the site. Despite a double-spread picture in the Design and Access Statement (DAS), which appears to be of the lane, we found no mention of it in the documents.

Despite selective quotes from the JLP Supplementary Planning Document in its Planning Statement, the applicant appears to have missed the expectations (8.65 – 8.67) that

- Safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limits the significant impacts of the development.
- New development and improvements to existing infrastructure should assist in creating a fine-grained network of walking and cycling routes (also referred to as 'filtered permeability').
- Proposals that link to existing streets, public spaces and key attractions will be encouraged and links should be enhanced as part of any new proposals.

Public transport

The Transport Assessment lists the relevant bus services, and shows that most are unavailable on Sundays, but does not include any evening timings, thus not revealing that these reduce to one route, passing hourly.

While the proposal does include two new bus stops on Plymouth Road, which we regard as essential to enable residents to use the main bus service to Plymouth, it makes no provision for other current or future bus services – for example a round town or station shuttle – to enter the development, through reservation of a space for a bus bay or shelter. This risks precluding public transport use by residents of the higher parts of the development.

While the application acknowledges the restoration of the railway to Tavistock as a heading for a financial contribution, it gives no attention to the means by which residents would reach the station. The location of this site means it could contribute, through better links to NCN27 as discussed above, to a much needed walking & cycling route to reach the station from below.

Parking

We welcome the inclusion of electric chargepoints in every property, and recognise that overall parking space numbers are as set in DEV29. However we are disappointed that none of that total allocation is used for communal parking space. That would not only reduce the risk of inconsiderate parking by visitors, but provide a base for an estate based car club in future. Most homes are fronted by a double parking space. While dimensions of these are not clear, and no artist's impression is given, it seems likely that there will be little space for any planting. Hence walking along the footway involves passing nothing more interesting than parked cars, any of which could be about to drive across the path.

Road safety.

We note that the road specification is mainly type R2 access road & R33 shared surface, with design speeds 20mph / 15mph. We welcome the intention that vehicle speeds within the estate will be low, but see nothing within the documents to suggest that the applicant has agreed with the Highways Authority that a 20mph speed limit will be set.

We have a number of concerns about the Transport Assessment, and note that Active Travel England has also questioned aspects of the methodology and conclusions.

It includes out of date or inadequate evidence – eg 2011 rather than 2021 census, a road safety audit conducted in 2019, traffic counts in conditions admitted to be untypical. There is no estimation of non-vehicle movements. The road junction is not assessed for suitability for cycling against LTN1/20 or any other standard. Discussion of traffic volume focuses on commuting, whereas Tavistock has other busy times – eg school pick up, tourism peaks. No account is taken of the age demographic of the town, which increases the risk that drivers will be suffering from failing sight or slowing reaction times.

The evidence in the Transport Assessment does not support the conclusion that "the proposals will ensure safe and suitable access for all users". While fig 3.4 & Appendix C show 19 collisions for 5 years, the narrative describes only the 8 in the 3 years 2020-2022 (ie including lockdown periods), thus omitting the serious casualty in 2018 of a vehicle hitting someone on a pedestrian crossing in fine weather. The fact that previous collisions were due to driver error not road design does not prove that the new design is safe – rather that some drivers using the A386 are careless, so that

increasing traffic volumes in all modes is likely to add to collisions. Nor does the absence of past collisions near a not yet built junction prove it will be safe in operation.

ENERGY

The Plan does not properly address JLP policy SPT2.11 "Explore opportunities for the use of renewable energy, including community energy schemes where appropriate, and reduce the use of energy through design and energy efficiency."

The presentation of the approach to energy is confusing. While EV charging points are rightly provided for each dwelling, no solar panels are proposed - although the Energy Strategy says they are a feasible option, and domestic battery storage seems to be left as an add on. Air Source Heat Pumps are cited in the Energy Strategy as the chosen option, but there is no sign of them in the exterior or interior views of the dwellings. As another objector has pointed out, there is no evaluation of the need for an on-site substation, or provision to locate it.

The site is potentially suitable for a communal ground source heat pump, and while the Energy Strategy gives some attention to it, it does not give a robust reason for not choosing it. The Energy Strategy discusses orientation of dwellings to make use of passive solar gain or shading from excessive heat, but there is no evidence presented as to how well the chosen layout does this. It is difficult to understand whether and how the design plans to exceed current Building Regulations on insulation standards or other energy saving measures, as the spreadsheet appendices are not accessible.

Rain water harvesting is not considered. This saves energy processing and pumping water as well as having environmental advantages.

In the "Climate Emergency Compliance Form - Major and Minor Applications.pdf", we are surprised that with no solar PV proposed “Mitigation” M1 - On site renewable generation” is claimed to be met in full.

NATURE

While swift boxes, bat boxes, insect bricks and hedgehog friendly fencing, are mentioned in the ecological assessment, there is no clear commitment to include them. These are simple, low cost measures which should not need to be postponed to the “reserved measures” phase.