Supporting detail for Transition Tavistock objection to planning application 0887/26/OPA (land at Violet Lane)

To be read with our objection lodged on the WDBC planning portal.
References are to application documents:
(DA) Design & Access Statement
(PS) Planning Statement
(TA) Transport Assessment
and to Tavistock Neighbourhood Development Plan (NDP)

Photos included here were taken by a volunteer just before 10am on Monday 28th June, so illustrate the paths in good weather outside peak travel times.

The Framework Travel Plan is not locally tailored and offers nothing likely to overcome the barriers identified below.

Public transport

Bus #98 claimed to provide convenient service (PS 2.8, 6.29) despite 2 hours between services and none on Sundays (TA Table 4.3).

However this route connects Green Lane to the B3357 for Princetown via Violet Lane. This is, and was at the time of the application, clearly shown on the Tavistock inset of Devon County Council's online map of bus routes https://www.cartogold.co.uk/Devon/map.html#Tavistock%20Map or could have been discovered by onsite observation or contact with the operator.

The closure of sections of Violet Lane to motor vehicles (which we agree is essential if development occurs) thus cuts off an established rural bus route. Green Hill is not an alternative due to the steep slope, narrow width and junction angle.

The development layout should therefore provide for a bus route through the site, entering and leaving through the new junctions provided for cars. However there is no mention in the junction design of suitability for buses, and the internal road widths, at 5.5m maximum (Map, TA p128, 133, DA 4.6.9) are below the 6m minimum (Manual for Streets 6.5.7). While this is the applicant's error, it is disturbing that it was not raised by Devon CC officers in the pre application discussions.

There is no provision in the Masterplan for on-site bus stops, and application (DA 4.2.4, 4.6.5, diagram 1 p 27, TA 4.14ff) expects residents to use existing off-site stops. While these are within 400m of the proposed Green Lane exit from the site, they are uphill from it, and a much longer uphill walk for residents at the lower (northern) end of the development. (The next bus stop along the B3557 cannot be safely reached on foot.)

A bus route through the development, with well designed, sheltered, stops at either end or at a mid point (additional to, rather than replacing, the nearest off site ones) could be presented as a genuine sustainable transport gain, since it would be within easy reach of the new residents, a better option than the current uphill walk for residents of Campion Rise, and a means of external access to the public open space that did not require car parking. To be an attractive alternative to car use, however, it would need at least double

the current frequency and some evening and Sunday services. However the proposed S106 heads of terms offer nothing towards public transport.

The claim (PS 2.8) that the bus service “provides a convenient alternative form of travel to a wide variety of services and facilities” is limited by the infrequency of #98 and the site being over 1.6km from Tavistock Bus station. Also, the statement that bus #1 goes to Plymouth station is incorrect (PS 2.8, TA 4.20). A route change in Plymouth cut out that stop 6 months before the date of the Transport Assessment, with no current indication that the operator will restore it.

Walking and wheeling

Access is significantly more difficult than claimed in the application documents, so this is far from a “highly sustainable” (PS 6.27), “well located” (TA 4.31, 9.12) or “ideal” (PS 6.30) location.

The claimed walking distances (method of calculation is not specified) show very few facilities within the nationally acceptable standard of 800m (TA 4.2, 4.3) – not “a vast number” (TA 4.7, 4.10), or even “many” (TA 9.9). Several key facilities are more than 1.6km away (TA Table 4.2, PS Table 3)

The shortest and step-free walking route to almost all the facilities cited (PS Table 3) involves exit from the site to Mount Tavy Road (B3357), either directly or via Green Hill (DA 4.6.5) then crossing it to reach the narrow footway on the far (northern) side. The Transport Assessment (deliberately?) does not cite its width. The B3557 is a main gateway to Dartmoor, used by coaches, motorhomes and forestry vehicles, and tourists unused to rural driving conditions, as well as the usual range local traffic.

Objections from local residents testify to the hazards already experienced by people using the footway on Mount Tavy Road. With walls or banks on the far side of the footway, there is no escape route for pedestrians when, for example, two large vehicles attempt to pass beside them.

Mount Tavy Road / B3557

looking east, sequence W-E, Mount Kelly / Violet Lane junction in centre photo

At the junction between the B3357 and the A386, pedestrians going anywhere except to Mount Kelly or a few houses would need to cross the A386. While the island crossing there is adequate for current conditions, the development would not only bring more pedestrians to this point, including children attending St Rumon’s infant school, but is predicted to

significantly increase peak time queues at the junction, reducing gaps in the traffic and making risk-taking by drivers more likely. There is currently little reason for drivers exiting the B3557 to turn right onto the A386 and placement of the island takes account of this. However turning right is the route from the development to employment and services in Okehampton or Exeter, and to nearby Pitts Cleave business park.

Green Hill is narrow and steep, with the footway, which is on one side only, reduced to a white line on the tarmac at the lower (northern) end – see photo.

Nearby public footpaths across field and moorland are cited as travel connections, with no admission that they are unlit, largely unsurfaced.(TA 3.32, 3.51, 3.52, 9.7).

PROW 10 crosses a sloping field and includes a stile and 5 flights of steep steps

PROW 10 – daytime leisure route for able bodied only!

The sections of Green Lane with no footway (about half the total length between Violet Lane and its southern [top] end) are not a “shared space environment” (TA 3.13) but the only direct route to key public open space on Whitchurch Down. Pedestrians have to walk on a 30mph road with, in places, high banks which hinder visibility. (Spot the walker!)

A new footway is only proposed on the short section of Green Lane between the end of the current pavement near Cox Tor Rd and the entrance from Green Lane to the site. (TA 3.29), leaving the section between the new entrance and Violet Lane with no footway. The application suggests pedestrians would use roads and paths within the new development to get from the entrance to Violet Lane or Green Hill. While possible, that is a diversion including extra hill climbs, and, unless designated as a new PROW, would not be signposted or clear on maps.

TA 3.32 implies public footpaths crossing Whitchurch Down provide “traffic free” connection to Whitchurch village. This is incorrect. While crossing the Down via gates to other parts of Tavistock is an attractive, but not fully accessible, option in daylight, onward connection to Whitchurch facilities (eg church, pub) is via Church Hill, which has no

footway and is as hazardous as Green Lane. The popularity of Whitchurch Down as a sociable open space means new housing within walkable distance needs safe access to it.

As the internal site layout is reserved, we have not reviewed it in detail. However:

- The application does not address access to or around the site for users of wheelchairs or mobility scooters, other than the cryptic acknowledgement that "the local topography may mean [walking] is not possible or attractive for some." (PS 6.28)
- The minimum footpath width of 1.8m means that unless Devon CC takes and uses powers to ban pavement parking, the usable footway could reduce to the point where pedestrians are pushed onto the carriageway. The proviso that the footway may sometimes be only on one side of the road is ominous.
- No provision is made for traffic-free connections to the neighbouring estates (eg at Fern Meadow or Airmoor Gardens) although this looks feasible and would enhance access to the proposed public open space in line with NDP policy TC1.
- The phrase on DA p32 "Frontage parking …. adds vitality to the street" portrays walking past car bonnets (often, now, towering above children or wheelchairs), is as preferable to passing gardens or courtyards.

Cycling

It is right to ensure pedestrians and cyclists, can use the whole length of Violet Lane, protecting both local use and existing long distance routes. However the claim that just 200m total of the sloping lane having vehicles prohibited will "encourage travel by sustainable modes of transport" (TA 5.43) is unjustified. It is too small a space to use, for example, for children to gain cycling confidence.

Discussion of local cycle travel is potentially misleading to readers not familiar with the streets named - eg (TA 3.38) re NCN 270 – a route largely irrelevant to this application, Neither of the named access points is easy for an inexperienced cyclist to reach from the site due to road junctions and hills, so inclusion gives a misleading impression that the site is close to an attractive leisure route. Appendix D presents a 2008 cycle map with no caveat as to current relevance, or apparent awareness of subsequent changes to NCN27.

TA4.12 cites Tavistock College and various sports facilities as within a 5km cycle ride, but does discuss how young or inexperienced cyclists could make the necessary connection to the traffic-free section NCN 27 at Abbey Bridge. The obvious link involves 2 roundabouts and a short but narrow section of the A386 which is a through route for lorries.

Driving

Road safety risks are underestimated:

- No road safety evidence is presented covering the southern (upper) part of Green Lane, despite the acknowledged mixing of traffic and pedestrians.
- The fact that the recorded injuries involved driver error rather than features of the road is not a source of reassurance (TA 3.55), as new development will increase the number of error-prone drivers and vulnerable users on those roads.

- Collision data is only partial evidence on whether there are “road safety issues” (TA 9.8). Roads perceived as dangerous deter active travel and modify the behaviour of responsible drivers.
- Peak hour congestion at main road junctions is predicted by the applicant. Time pressure is likely to increase risk taking by drivers, both at the junctions and attempting to recoup time on other roads.

The Transport Assessment demonstrates serious future impact on peak hour congestion at some junctions, but attempts to evade the implications.

- The traffic models used by the applicant predict significant queues for the existing B3557/A386 and A386/Whitchurch Rd junctions at peak times by 2031. (TA Appendix J – “summary of junction performance” tables) This would cause problems for new residents and other peak hour traffic using the A386 or B3357.
- The argument (PS 6.61, 6.62, DA 2.1.18) that this is largely due to other committed developments is invalid. The nature of queuing systems when at full capacity is that a small increase in the arrival rate does disproportionally increase queue length. For example the summary table on TA p204 shows that the addition of this development would increase predicted delay, currently under 1 minute, from around 3 minutes in 2031 with committed development to around 5 minutes, and queue length from 14 to over 30.
- The claim that models are “unstable” for over-capacity junctions (TA 7.33) is misleading – the calculations would work as intended. However, in reality, the queue at a particular junction might be contained because some drivers choose alternative routes to avoid it, displacing problems to other junctions which are not included in the model.
- Junctions in Tavistock at particular risk of displacement from this site are Down Road / Whitchurch Road / Pixon Lane and Church Hill / Whitchurch Road / Anderton Lane. These are already unsafe for all road users due to poor sight lines and lack of protection for pedestrians.

The traffic modelling takes no account of uncertainty about the origin and destination of vehicles accessing the site and lack of attention to tourism impact on the B & A roads. The claim (DA 2.1.18) that it is “minimal impact” and “only one additional vehicle per minute during peak hours” or “will not cause severe traffic impacts” (DA 2.1.20) is therefore unreliable.

- The modelling predicts which direction vehicles accessing the site come from or go to based on 2011 census travel to work patterns for the whole of Tavistock. So even commuting journeys may in practice be quite different, both on first occupation and over time.
- The census does not measure non-commuting journeys (eg school drop off, deliveries), and is not specific to this side of the town.
- While late April is a reasonable choice for a one week sample, this does not enable the modelling to predict the impact of seasonal variations in traffic on the B3357, a key tourist route across Dartmoor, or the A386, from which in-town links go to both Cornwall and north Devon.