

Planning application 3614/18 Plymouth Road

Comments of Cllrs Jess Evans and Graham Parker

1 WHAT IS SUBMITTED FOR DECISION?

- 1.1 Linden Homes is to be congratulated in preparing a series of Parameter Plans. These are extremely helpful in understanding how the proposal works and what its impact will be. They also help to identify issues that need further clarification
- 1.2 It is normal for Parameter Plans to be referred to in conditions to provide a baseline for RM submissions. However, the Application form only refers to the Master Plan, Circulation Plan and Engineering Drawings. Could it be confirmed that the Parameter Plans are submitted so as to be incorporated into any conditions?

2 RED LINE

- 2.1 We are deeply disappointed with the applicant's choice of red line.
- 2.2 When Linden first approached the Council, discussions led to an agreement that the western part of the site is very sensitive in landscape terms. It was agreed that development would be kept away from Brook Lane and the AoNB. It was agreed that, in landscape terms, a line around 90 metres from Brook Lane should mark the extent of a landscape buffer. Since that would have led to a significant reduction in development area, Linden persuaded the local planning authority that the boundary could be adjusted elsewhere to compensate.
- 2.3 Linden then objected to the 90-metre buffer in the Joint Local Plan and it was removed by the Inspector (although a general buffer requirement still remains).
- 2.4 The red line now excludes the vast majority of the 'buffer' and leaves it, potentially, to be identified by others as a future development site. Since the land is outside the application site, its status as open land cannot be secured by a condition.
- 2.5 However, its status could – and should – be secured by means of a S106 Agreement, the purpose of which would be to secure the setting of the AoNB. We ask that the applicant and the landowner be invited to enter into such an Agreement.

3 EMPLOYMENT AREA

Amount of development

- 3.1 Outline applications have two purposes.
- 3.2 One is to identify appropriate uses for the site. We have no objection to B1 use, which is identified as appropriate in the local plan. However, as set out in Policy DEV16 of the Joint Local Plan, the application should be accompanied by an Impact Assessment.
- 3.3 The second is to demonstrate that the site can accommodate what the applicant claims can be accommodated. In this case, the applicant's assertion that the 2ha site can accommodate 18,600 sq.m. of B1a development is – literally – unbelievable:
 - It is true that the buildings illustrated, at 3 storeys high, could just accommodate that amount of space.
 - It is unbelievable that there is sufficient demand for 18,600 sq.m. (nearly 200,000 sq.ft.) of B1 *Office* space. The needs in Tavistock are for the whole range of B1 a, b and c. B1b and c uses are largely inappropriate for 3 storey buildings
 - However, there is virtually no space for car parking, servicing, vehicle circulation etc. Given that the TA (para 8.13) states that 68% of the traffic to the site will be car or van this is an astonishing omission.
 - We believe that there is no prospect of the Employment part of this proposal being able to meet the requirements of the Devon County Highway Design Guide.

- 3.4 One also has to wonder what is behind the assertion that the whole of the Joint Local Plan employment allocation for this site can be accommodated on this land. Is the objective to 'soak up' the employment allocation, leaving the land to the north free for additional housing?

Access

- 3.5 Given that this is an outline application, there is no layout reason why the employment site could not be accessed directly from the Tiddy Brook roundabout. Access could be achieved directly into what is shown on the master plan as a courtyard.
- 3.6 The access proposed only makes sense if the site is to be developed with a single large building with car parking – something such as a hotel?

4 TRANSPORTATION

- 4.1 Paragraph 2.3 of the Transport Assessment paraphrases paragraph 108 of the NPPF. It is important to read that paragraph as a whole:

“108 In assessing ... specific applications for development, it should be ensured that:

- a) **Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;**
- b) **Safe and suitable access to the site can be achieved for all users; and**
- c) **Any significant impacts from the development (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”**

- 4.2 The key words in this paragraph are:

- “Ensured’ in the introduction and
- “And” at the end of each requirement. The requirements are *cumulative*, not alternative

- 4.3 In other words, if *all* of the three requirements of para 108 can't be *ensured*, then the applicant isn't entitled to its permission.

- 4.4 As yet, for the reasons set out below, we don't believe that the application achieves the requirements of the NPPF

Vehicular access

Accesses to and from Plymouth Road

- 4.5 We have no objection to the principle of creating two new accesses but, along with local residents, we have major objections to the way in which the accesses are to be achieved:

- ‘Ghost island’ junctions in this location badly underestimate the difficulties of turning on and off Plymouth Road. The ghost island at Tesco is often a nightmare, with people wishing to turn right choosing to turn left and either ‘going around the block’ or using the Tiddy Brook roundabout to perform a u-turn. We believe that repeating this arrangement on the western side of Plymouth Road will cause unnecessary manoeuvres and queueing and impatient, possibly dangerous, movements. In pre-application discussions with the applicants, we spoke of new roundabouts, which would be the ideal solution. However, if DCC advises that it would be safe, then a traffic light/pedestrian crossing combination would be acceptable to us. However, we object most strongly to the accesses currently proposed. We also note that the Highway authority has objected on the grounds of the absence of a safety audit.
- There is no common-sense reason for the access to the employment area being anywhere but a fourth leg from the Tiddy Brook island. The ‘ghost island’ proposed will cause unnecessary movements that could be avoided entirely by taking access directly from the island. See also our separate comments on the employment area in section 3 above.

Access to and from the unnamed road

- 4.6 We can't see any justification for the ‘potential future access’ to the unnamed lane and we object for three reasons:

- That lane has an extremely difficult junction with Plymouth Road at its eastern end and we should not be encouraging additional traffic to use it.
- The lane is used by pedestrians, including young children and by horses. It is extremely narrow, has no footways or lighting and, again, we should not be encouraging vehicles to use it
- We believe that, at times, vehicles will find it so difficult to exit the development to turn right on to Plymouth Road via the access proposed, people will be tempted to avoid the congestion by using this 'back door' route to access Brook Lane, turning right to the roundabout by Westmoor Vets and then right on to Plymouth Road. This will cause serious harm to the existing residents of Brook Lane and will increase traffic on Brook Lane, which is already an oppressive pedestrian environment.

4.7 There is no reason to identify this access in this application and there is certainly no reason for WDBC to sanction it at the present time, especially as there is no indication that it would be needed to access the employment site to the north. If it proves essential to create an access from this residential site to the employment land to the north, then it should be considered at the time that an application is submitted for that land. Then it could be considered as a part of a local network of pedestrian, cycle, equine and road traffic circulation.

4.8 We would be grateful if the applicants could be told that this is an unacceptable proposal at this time.

Pedestrian access

Plymouth Road

4.9 This is a potentially lethal stretch of road and, with the additional uncontrolled vehicular accesses proposed, along with the likely pedestrian and cycle crossing movements in both directions to and from bus stops, access to Tesco, Morrisons, Lidl etc, schools and to the proposed residential and employment development, we simply don't believe that a pedestrian refuge will be sufficient and we strongly urge that this be revisited.

4.10 The absence of a footpath connection to connect with the footpath by Lidl is a major weakness. This should be secured as a part of the S106 Undertaking if at all possible.

4.11 If it is not possible, then for highway safety reasons, a *controlled* crossing should be provided from the site to join with the footway on the eastern side of Plymouth Road.

Safe routes to School

4.12 In order to access Whitchurch Primary School, forcing children to cross Plymouth Road via an uncontrolled crossing is sheer madness!

4.13 Safety for children is an especially important part of 'sustainable development'. The applicant should be required to demonstrate Safe Routes to all four of the local Primary schools - Whitchurch, St Peters, Tavistock Community Primary and the new school proposed for Callington Road.

Sustainable location

4.14 The distances shown on Table 5.1 misrepresent the sustainable location of the site. The measurements should be taken from the centre of the site, not the entrance and the routes chosen should be safe and accessible by people with mobility difficulties. From the few that we have checked, this makes a significant difference.

4.15 The conclusions should be checked against Figure 3.2 of the Joint Local Plan (which has 'significant weight').

Public Transport

4.16 Para 3.20 of the TA argues the merits of the rail proposal for commuting. However, the TA contains no proposals to enable people to access the railway by sustainable means of transport – and no comment about the adequacy of the proposed parking arrangements at

the station. With that omission, the applicant is in no position to claim any benefit from the proposed rail link.

- 4.17 The TA completely omits the 89 bus, which is, potentially the most important public transport link within Tavistock. Every opportunity should be taken to support and extend the timing of this service and should certainly be incorporated into the Section 106 Undertaking. Please ask the applicant to update the TA in this respect.

Accidents

- 4.18 PIAs are often misleading – not by intent, but because they record only what they say - Personal Injuries. We are aware of at least one collision where a vehicle was written off in a head-on collision on Plymouth Road by Anderton Lane. There is a serious problem of speeding and dangerous overtaking at this location.
- 4.19 Could you point the applicant to the TA that accompanied the Butcher Park Hill application? That contained an audit of the A386, which was agreed by the County Council and which was relied on by the Inspector when reaching her decision.

Minor transportation point

- 4.20 Para 3.8 of the TA – This is confusing. Plymouth Road *is* the A386

5 HERITAGE

- 5.1 We have seen Bill Horner's (DCC) comments and, to save time duplicating, we agree with them.

6 EDUCATION

- 6.1 We believe that the Education response hides a serious crisis in both Primary and Secondary Education provision in Tavistock.
- 6.2 The response states clearly that ***“If approved, this development will be deemed built and therefore affect the forecast pupil numbers for future developments in this area”***
- 6.3 This statement must apply equally to the Callington Road, Butcher Park Hill, New Launceston Road and Brook Lane applications that have already been approved. In other words, the following statements are made assuming that all of these other developments have been built:
- ***“The Local Authority has some forecast capacity across Tavistock, so is requesting for 21 primary pupil places.”*** Since the requirement for this site is calculated as being 62.5 places (say 63), that must mean that the LEA believes that there are 42 spaces free in Tavistock's primary schools – *after they have accounted for the 250 pupils generated by the other Tavistock developments that have been approved!!* We don't think this makes any sense at all. We know that there aren't 292 empty pupil places in Tavistock, which there would have to be to in order to account for all of the other developments and still leave the 42 vacant places claimed by the LEA in their comments. There can't, therefore, be any justification for discounting the contribution from this development by 42 places and the S106 contribution should, in fact, be £1,001,187, not £336,399 as requested. If this approach has been applied to the other applications (for example, the first 320 homes in Callington Road don't pay anything to Education), then the LEA will not have gathered anything like enough to build a Primary School. We need to press very hard on this.
 - ***“There is sufficient capacity forecasted at Tavistock College to mitigate the impact of this development and, therefore, we are making no request for secondary education infrastructure”*** This statement flatly contradicts the information that we have been given, that the capacity of Tavistock College has been badly overestimated and that, in fact, the College is full.
- 6.4 On the basis of this, we believe that, together with the planning permissions that have been granted, this S106 requirement won't provide anything like the resources to create either the Primary or the Secondary capacity necessary.

7 FLOOD RISK

- 7.1 We have read the FRA and are satisfied, subject to officers' technical observations that the proposal will not increase flood risk elsewhere and will deal satisfactorily with Foul Sewage.
- 7.2 For the sake of completeness and to resolve the fears of a number of Brook Lane residents, we would welcome the applicant's assurance that there will be no increased run off to the west of the site.

8 LANDSCAPE

- 8.1 Along with many of the residents of Brook Lane, we ask for the Landscape and Visual Impact Assessment to be extended to include views from the AoNB to the west and from the southwest

9 PLANNING AGREEMENT

- 9.1 A number of people have raised the issue of the quality of local infrastructure, which needs to be addressed. We endorse these points in respect of:
- Contributions to Primary and Secondary Schools (see above)
 - Links to pedestrian and cycle networks
 - Contributions to local bus services – especially the number 89
 - Crisis in the provision of health services
 - Affordable Housing provision
- 9.2 We cannot find anywhere in the application proposed Heads of Terms. Given the high level of concern about infrastructure in Tavistock, this is an important omission which should be resolved as quickly as possible.

Councillors Evans and Parker

February 18th 2019