



Direct telephone: 01822 813735  
E-Mail: [anna.henderson-smith@swdevon.gov.uk](mailto:anna.henderson-smith@swdevon.gov.uk)

Mr Louis Dulling  
Bailey Partnership

Our ref: 2570/19/PRM  
10 May 2021

Dear Mr Dulling

**Reference number:** 2570/19/PRM

**Proposal:** Proposed demolition of 1&2 Springhill and development of accommodation supporting homeless persons

**Location:** 1 &2 Springhill, Tavistock

### Proposal

The demolition of the existing building at Springhill, currently 9 self-contained flats for those in housing need. No 1 Spring Hill (end-terrace) is divided into three one-bedroom flats. No 2 Spring Hill (terrace) is divided into two two-bedroom flats and four one-bedroom flats. There is parking for approximately 6 cars within a rear courtyard. The proposal is to re-develop this site to provide new accommodation similarly for those in housing need comprising Creation of 11 self-contained apartments with a mix of 1 and 2 bedroom units:

2 No.1 bed 1 person (36sqm)

3 No. 1 bed 2/3 person (50Sq)

3 No. 2 bed 3 / 4 person units

3 No. 2 bed 4/5 person units

Inclusion of a ground floor staff office and bin store

Rear courtyard to provide outdoor space for residents and 2 parking spaces

### Designations/constraints

World Heritage Site

Tavistock Conservation Area

Grade II listed buildings immediately opposite the site

Plymouth SAC 12.3km buffer to the Tamar Valley European Marine Site

## Planning policy

Section 70 of the 1990 Town and Country Planning Act requires that regard be had to the development plan, any local finance and any other material considerations. Section 38(6) of the 2004 Planning and Compensation Act requires that applications are to be determined in accordance with the development plan unless material considerations indicate otherwise. For the purposes of decision making, as of March 26th 2019, the development plan for Plymouth City Council, South Hams District Council and West Devon Borough Council (other than parts South Hams and West Devon within Dartmoor National Park) comprises the Plymouth & South West Devon Joint Local Plan 2014 - 2034.

The relevant development plan policies are set out below:

**The Plymouth & South West Devon Joint Local Plan was adopted by South Hams District Council on March 21st 2019 and West Devon Borough Council on March 26th 2019.**

SPT1 Delivering sustainable development  
SPT2 Sustainable linked neighbourhoods and sustainable rural communities  
SPT3 Provision for new homes  
SPT11 Strategic approach to the Historic environment  
SPT12 Strategic approach to the natural environment  
SPT14 European Protected Sites – mitigation of recreational impacts from development  
TTV1 Prioritising growth through a hierarchy of sustainable settlements  
TTV2 Delivering sustainable development in the Thriving Towns and Villages Policy Area  
TTV3 Strategic infrastructure measures for the Main Towns  
DEV1 Protecting health and amenity  
DEV2 Air, water, soil, noise, land and light  
DEV8 Meeting local housing need in the Thriving Towns and Villages Policy Area  
DEV9 Meeting local housing need in the Plan Area  
DEV10 Delivering high quality housing  
DEV20 Place shaping and the quality of the built environment  
DEV21 Development affecting the historic environment  
DEV22 Cornwall and West Devon Mining Landscape World Heritage Site  
DEV23 Landscape character  
DEV26 Protecting and enhancing biodiversity and geological conservation  
DEV29 Specific provisions relating to transport  
DEV30 Meeting the community infrastructure needs of new homes  
DEV31 Waste management  
DEV32 Delivering low carbon development  
DEV33 Renewable and low carbon energy (including heat)  
DEL1 Approach to development delivery and viability, planning obligations and the Community Infrastructure Levy

Other material considerations include the policies of the National Planning Policy Framework (NPPF) and guidance in Planning Practice Guidance (PPG). Additionally, the following planning documents are also material considerations in the determination of the application:

JLP Supplementary Planning Document

Neighbourhood plan – no Neighbourhood Plan for Tavistock as yet

## **Principle of development**

The spatial priorities for Tavistock are set out in the JLP, under SP2 in particular in this case the requirements under points 4 and 8 to :-

- have a good balance of housing types and tenures to support a range of household sizes, ages and incomes to meet identified housing needs
- have services and facilities that promote equality and inclusion and that provide for all sectors of the local population

The proposed development can be supported in principle under JLP policies SPT1 and SPT2, TTV1, TTV2, DEV8 and DEV9. The site is sustainably located within Tavistock town and is not a greenfield site but is previously developed land. Combined with this spatial aspect, the proposal is for specific accommodation for those in housing need, a housing type of very limited provision in the Borough and for which there is a need and would add to the provision of mixed communities, access to facilities for all and the promotion of inclusion and equality. As such then the principle of this planning use in this location is accepted and is supported by policy and both JLP policy and Affordable Housing Specialists of the Council are in support of the principle of this proposal

## **Design and Heritage**

Main policies for heritage DEV21 and DEV 22 and for design are DEV10 and DEV20

Throughout the course of this pre-application discussion detailed feedback has been provided by both planning and heritage specialists in relation to heritage and design.

The principle issue was that of demolition of the existing building which is not listed but is of historic interest and is a heritage asset. It makes a positive contribution to the Conservation Area but the recent Conservation Area Management Plan also acknowledges a sensitive redevelopment could also contribute. Planning and Heritage Specialists initially raised concerns about the premise of total demolition of the building, as did DCC Archaeology on the reading of the first edition of the Heritage Statement provided. Following this additional heritage work was undertaken by yourselves and the Developer Option Appraisal was also submitted to officers in December. This concluded and promoted that a total rebuild salvaging existing materials was the preferred option. This additional work and analysis has satisfied the planning and heritage specialists that from a heritage aspect the options regarding retention and refurbishment/adaption, total and partial demolition and materials re-use have been adequately explored and presented.

Following this the second issue to address is that of the subsequent replacement building and its site alterations. Following initial detailed feedback from heritage and planning specialists (provided previously under earlier separate cover) the most recent iteration of the design has taken on board the majority of the points raised by officers and reflect the input provided well for the most part. The Heritage Specialist comments which remain outstanding on the most recently presented design at this time are all surmountable in officer opinion but are as follows (Heritage Specialist email 22/4 and snip images sent in full under separate cover):

- *The road frontage is improved with the continuous eaves line and is now a good echo of the existing which I'm sure many locals will appreciate.*

- *The split treatment of the rear wing elevation is rather eccentric on its own so I'm not sure why attention is drawn to it further by changing materials and window sizes between the two halves as well? This is very visible from Callington Road and I would favour a simpler, less contrived treatment without the cut-away, which would also be cheaper to build and give additional space.*
- *The imitation of the diamond pattern slate hanging on the front elevation is an understandable repetition of existing but I see no point of doing the same on the rear wing. This is a quirky feature that is a small element of the existing building and not at all typical of Tavistock. It seems a pointless addition of cost in time and materials to cut so much slate into diamond form and the extra lap needed for this is also extra waste of a primary material. Good ordinary slate hanging applied using nails and hung in reverse, as is traditional, would be absolutely fine. (see snip attached to email)*
- *My previous comments about the solid stair at the lower end remain. The existing bay windows are a feature that takes advantage of the sunny aspect and view. The DAS says, 'The client has an in principal objective to provide a low carbon solution. Natural light and solar gain will be incorporated into the conceptual design not only to improve the occupants comfort but also to reduce energy costs. In order to maximise the benefits of natural daylight the proposal will [be] positioned in alignment with the path of sun.' This is not being done and may be an opportunity missed? The positioning of a blank wall at the focal point of the sight line coming up from West St may draw criticism? (see pic attached to email) The cantilever over that entrance will add interest if detailed well. Can the feature window on the NE be duplicated on both aspects or some other relief brought in? Perhaps windows to the landings to allow enjoyment of the views?*
- *Solar PV is fine so long as it is integrated into the roof slopes.*
- *Details of how material will be reclaimed and used will be needed. The southern building incorporates some nice dressed Bath stone that should be used as well as the rubble stone.*
- *As usual material details, fenestration, eaves, r/w goods etc all need to be detailed and the sooner the better.*
- *The roadside railings and entrance canopy need to be demonstrably positive features. The rails in particular could be said to lack local distinctiveness.*

These comments are very pertinent, in particular the lack of need for the step in the roof and rear wall on the projection, and the lost opportunity of the lack of glazing interest in the end elevation containing the rounded stairwell - this is the loss of a feature in terms of the existing external end bay, plus this interesting and potentially well-lit internal space seems a little underexploited as only a stairwell.

With regards to the materials finish, the view from the west approach is quite exposed and prominent and at present the proposed elevation reads almost as 3 vertical panels of differing material – reused stone to the front façade (which is laudable and very appropriate here) then a strip of render building, and then a strip of slate hanging. A section of the stone has been carried on a little way around but it is advised that the stone facing be used in some or all of the sections highlighted yellow below in order to tie the front façade into the depth of the building, presenting a more cohesive pallet of materials throughout and avoiding the stone presenting as just a superficial 'skin':



The inclusion of the solar PV is welcomed, DEV32 applies here in terms of delivering a low carbon development. One of the main benefits of the complete loss of the building is the opportunity to significantly upgrade its build standard, thermal performance and exploitation of renewable energy. It has a South facing roof and this has been well utilised here and will aid in meeting DEV32 criteria.

### **Landscape**

Main policy DEV23

The Council's landscape specialist has not been consulted up to this point as the landscaping shown is indicative at this stage, and the finer detail of this could be dealt with via condition if the application is approved, however it would be beneficial for this to be considered prior to submission even just in the round as although there is little opportunity for hard and soft landscaping of the site, this essentially makes exploiting the opportunity all the more crucial. For example the material for the drive combined with the boundary and retaining walling and planter to the south should be carefully considered as it is visible from the south and when travelling west along the road. I would advise local stone facing, possibly reused from site, wherever possible. The raised planter at the rear will be crucial in adding some appropriate trees and green amenity to the site for residents and softening the views from the south.

We are happy to consider a more detailed landscape scheme prior to submission to consult the Council's Landscape Specialist for advice and feedback if you wish.

### **Amenity**

Policy DEV1

The proposal introduces a rear wing with residential windows therefore being closer to the Southern boundary than at present and introducing a large number of windows onto the western elevation of the rear wing facing the neighbouring properties and gardens to the west. There is a degree of physical separation by distance to these and to the properties and gardens to the south, and the levels differ greatly with the application property placed much higher than those around it resulting in the potential for window views to look straight over the top of, rather than down into, properties, however this distance of separation and angles of views will need to be demonstrated and considered in a submission and

depending upon the result of this some windows may need to be partially obscurely glazed to limit overlooking , particularly from room frequented all day such as living areas.

## **Highways and Parking**

Policy DEV29

There has been constructive and continual input from DCC Highways which has resulted in the setting back of the replacement building which is considered beneficial in resident amenity and highway safety aspects. Previous comments from DCC Highways have been provided to you and I understand some have also been provided direct to the applicant form DCC.

Apart from the principle of the setting back of the replacement building, the car parking requirement has also been discussed with DCC Highways and the planning specialist and we are satisfied that, despite the guidance of the SPD with regards to parking requirements for various uses, that the level provided in this location, given the use and likely car ownership/staffing levels are acceptable on balance, particularly given the site's sustainable location and connectivity to the town and onward public transport.

The most recent layout and design provided to DCC resulted in the following advice/comments:

*'Only comment at this stage is that I note that the plan SHT BPC XXGF DR A 0351 shows two spaces at the 'rear' of the building. They appear to lack the minimum 6.8 metre clearance behind them to enable drivers to manoeuvre and satisfactorily turn to enter the road in forward gear. The presence of a wall adjacent to one of the spaces would also mean that one should be widened to 3 metres minimum to enable door opening too.'*

Cycle storage will be required on site in line with the SPD and at least one parking space should have an electric vehicle charging point.

## **Drainage/Flood Risk**

Policy DEV35

The site is not within a critical drainage area nor a floodzone (2 or 3) as such I do not anticipate any issues in this regard, however due to the increase in number of units, on the assumption that the surface water from the site currently goes to the combined sewer you will need to seek confirmation from SWW that they are still happy to accommodate this (although the building is increasing in size it is only taking up currently impermeable area so I anticipate no likely issues here). As the number of units and thus bathrooms and toilets is increasing you will also need confirmation from them please that they can accommodate this additional foul flow. This information will need to be submitted with the application.

## **Ecology**

Policy DEV26

The most recent submission is much improved re ecology and has been worked up in conjunction with the previous comments from the biodiversity specialist and with input of your own ecological consultant. WDBC have now outsourced our ecological consultations

to DCC Ecology, they have been briefed on the scheme and our previous comments and they have replied to the consultation on the most recently submitted plans with the following observations:

*'The Ecology Assessment (First Ecology, December 2020) has been provided and the survey methods, presentation of results and recommendations are satisfactory.*

*The bat dusk emergence and re-entry surveys confirmed the presence of a day and hibernation (unconfirmed) roost within the building each used by a maximum of two common pipistrelle and one soprano pipistrelle bats, with a common pipistrelle day and hibernation (unconfirmed) roost used by one individual identified within the attached building to the northwest of 1-2 Spring Hill.*

*The proposed works would result in the loss of a roost and therefore a European Protected Species Licence (EPSL) will need to be obtained from Natural England prior to the commencement of works. It is my opinion that the detailed mitigation measures included in the Ecology Assessment satisfy the third test of the Habitats Regulations, and that Natural England will grant a licence.*

*Just the one query - I note that some areas of the roof will be lined with bitumen roofing felt and other areas with breathable roofing membrane. Paragraph 4.1.10 states that 'counter-battening' will be deployed to prevent bats accessing areas lined with breathable roofing felt. Please can the consultant ecologist provide more information on how this 'counter-battening' will work in practice and will prevent bats from coming into contact with the breathable roofing membrane?'*

I would advise that the above are considered and addressed prior to any formal planning submission,

In addition to the above, the site falls within the Zone of Influence for new residents to have a recreational impact on the Tamar European Marine Site (comprising the Plymouth Sound and Estuaries SAC and Tamar Estuaries Complex SPA). This Zone of Influence has recently been updated as part of the evidence base gathering and Duty to Cooperate relating to the Joint Local Plan. A scheme to secure mitigation of the additional recreational pressures upon the Tamar European Marine Site can be appropriately secured by condition, and this approach has been agreed by Natural England. Usually any net gain in residential units would be required to provide a payment towards the management of this designated site in order to offset this identified recreational impact. Standard Affordable housing is required to contribute. It is acknowledged that this proposal is not standard affordable housing and is somewhat unique in its restricted occupation. As such at present for consistency I am consulting with PCC to see whether they have collected such monies on any similar schemes they have (as they too are within this ZOI) and it may be that unless such a contribution is actually proven to be unviable to provide, that Cllrs have to make a decision on whether it is reasonable and necessary to require such monies in this instance. Should the contribution be required the amounts at present are £236.62 for a one bed flat and £330.92 for a 2 bed flat.

In line with JLP Policy DEV26, development is expected to protect and enhance biodiversity. The SPD requires major developments to provide a 10% Biodiversity Net Gain; the DEFRA matrix will be needed to accompany any application submission. It is acknowledged that ownership control and opportunity on this site are limited, however any enhancements possible should be built into the site, the building and its landscaping

scheme, both for ecological purposes but also due to the wellbeing benefits for residents of such incorporation of nature into the scheme and site.

## **Contaminated Land/Ground Investigations**

Policy DEV2

I have not sought input from the Environmental Health team as there has been no submission of a contaminated land statement, but do not anticipate there would be any significant issues as the use proposed is no more vulnerable than that on site at present; a contaminated land assessment would be required to accompany any application, along with any remediation deemed necessary.

## **S106 contributions.**

Policy DEL1 and the SPD and evidence base on developer contributions

The threshold for financial contributions to be made towards Open Space Sport and Recreation (OSSR) and Education monies is usually any scheme above 5 or 10 units. This is for 11 but I appreciate the net gain is only 2. I am contacting DCC and our OSSR team to discuss whether such contributions would be required given the low net increase of only 2 and given the occupancy restriction. I will update you as soon as they reply.

As discussed under ecology above, there may be a requirement to make the payment towards the TVEMS ZOI - 1 bed £236.62 and 2 bed flat £330.92.

If contributions are required and you consider that these can not be afforded by the development due to financial viability reasons, then this should be demonstrated through the submission of a viability appraisal and we will consider this as part of the submission and any external viability consultant input required to assess this will need to be funded by yourselves as developer.

## **Conclusion:**

Overall the principle of this redevelopment in terms of the proposed use and the demolition, materials salvage and re-use and rebuild is considered acceptable. There remain some details regarding amenity, design, parking and landscape to overcome, however these are the finer details which should be addressed proper to submission but which do not go to the principle of the scheme.

Uncertainty re potential need for a financial viability report and contributions remains and you will be updated on this as soon as responses from consultees are received.

## **Validation requirements:**

Should any future application be submitted it would need to include the following supporting information at validation stage:

- Location plan at 1:1250 or 1:2500 all elements of the scheme including any public/biodiversity enhancements, drainage, new pedestrian access to the public highway must be included within the redline site boundary. Any other land owned or controlled by



the applicant must be outlined in blue. All plans must have a scale bar and should not be annotated "do not scale"

- Site plan 1:500
- Detailed elevations and floor plans
- Planning Statement, to include policy analysis and information to satisfy SPD, to include DEV32 carbon reduction, EVCPs, cycle parking
- Drainage information
- Ecology reports and mitigation, DEFRA matrix for net gain - Community consultation results
- Landscaping scheme,
- Contaminated land statement
- S106 Heads of Terms if required

Please be aware these comments are made without prejudice to any future decision made by the local planning authority, and do not bind or fetter any future decision. If you wish to submit further plans for comments prior to submitting a planning application this will require an additional fee as per our charging schedule.

( <https://www.southhams.gov.uk/article/3225/Pre-Application-Service>)

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