

BRIEFING FROM COUNCILLORS B. SMITH AND G. PARKER

OUTLINE APPLICATION FOR PLANNING PERMISSION 0887/26/OPA MADE BU TAVISTOCK LVA FOR THE DEVELOPMENT OF LAND AT VIOLET LANE FOR UP TO 143 HOUSES

At their meeting of June 23rd, 2026, the Committee held a general discussion regarding planning application 0887/26/OPA.

The discussion ranged over many topics and issues and, consequently, the Chairman and Councillor Parker were requested to prepare a report bringing these together for discussion and approval at the meeting on July 13th, 2026.

That report is attached. It deals with a number of issues important to Tavistock.

It is important to make clear that *nothing* in the attached report is intended to encourage the Town Council to stand against all, or any, development in the town. That would be contrary to Government policy. The report aims to set out the framework for the Councils' consideration of this application and to provide specific advice only on that application.

Its conclusions are, broadly:

Chapter 1 - the application is designed to assist West Devon Borough Council with its 5-year housing land supply. However, the applicant is not a developer and so, to ensure that (if approved by West Devon Council) development **does** contribute, the Committee is advised that powers exist to shorten the period for implementation.

Chapter 2 – sets out that policies TTV26 and TTV27 of the Joint Local Plan are the main policies that apply to this proposal. The chapter explains why they should be accorded full weight in WDBC's decision.

Chapter 3 – argues that this proposal is not for a Sustainable Development. Therefore, the presumption in favour and the 'tilted balance' set out in the NPPF do not apply and the application should be refused. There are three broad reasons for reaching this conclusion:

- The site is not in a Sustainable location – it provides a hostile environment for pedestrians travelling to and from the town's facilities and services; there are no dedicated cycle routes serving the locality and the application does not encourage the use of buses. There are negligible alternatives to the use of the private car. Therefore, the proposal fails to qualify as a 'sustainable development' when assessed against the JLP, the Neighbourhood plan and the NPPF. The report contains a reference to a recent appeal elsewhere by the same applicant that was dismissed on precisely these grounds.
- The proposal would, as the applicant states, contribute numerically to the provision of housing as required by the government. However, it fails to take account of the need for affordable housing evidenced by the Government, the Devon Housing Commission, West Devon Borough Council and Tavistock Town Council. It fails to make provision for this Affordable Housing as required by policy TTV27, which is a policy designed to *enable* (not 'restrict' as the applicant argues) the provision of homes in locations where, otherwise, they would be restricted. The application provides no material considerations to indicate why this policy should be set aside.
- The applicants' commitments to provide sustainable development through layout and building are unenforceable and, although worthy, should be ignored.

Chapter 4 – examines in some detail the Transport Assessment (TA) submitted by the applicant and sets out a number of critical issues:

- The applicants have carried out an extremely limited assessment of the impact of their proposal on the key junctions in Tavistock, omitting most of them even though the TA proposes that significant amounts of traffic will pass through them. It is proposed to ask the County Council, as a matter of urgency, to prepare a Traffic model that can act as a common basis to assess the individual and cumulative impact of developments in the town
- The Trip Rates that the applicants apply are much too low, given the absence of alternatives to the private car. Trip Rates determine the number of vehicles that the development will generate

during the peak hours. The applicant suggests that this number will be 75 vehicles per hour. Chapter 4 reasons that a more realistic figure would be well over 110 vehicles per hour. Thus, the TA seriously underestimates the impact that the development will have on Tavistock's highway network.

- The application assigns a significant amount of traffic to a movement that simply cannot happen, namely travelling south along Mount Tavy Road, turning right into Vigo Bridge Road and then turning left into the Town Centre (and the reverse in the evening peak hour). The report argues that this traffic must be reassigned so that it stays on Mount Tavy Road until it reaches the Godolphin (Abbey Bridge) roundabout.
- The applicants' limited assessment of the impact on junctions identifies that two junctions (Godolphin and Mount Tavy Road/Stannary Bridge Road) are already operating over capacity. The report concludes that re-assigning the Vigo Bridge Road movement, including reassigning the pedestrian movements as car journeys and making use of a more realistic Trip Rate would treble the amount of traffic estimated by the TA to come to these junctions. This would result in severe harm and gridlock, so that refusal would be merited by reference to paragraph 116 of the NPPF.
- The applicant has prepared no assessment of the impact caused by traffic generated by the development on the vitality and viability of the town centre and the World Heritage Site (the later point supported by the County Archaeologist)

Conclusion

The Committee is **RECOMMENDED**

A to advise Full Council at its meeting of July 24th, 2026, to object to this application being granted planning permission, for the following reasons:

- 1 As set out in Chapter 2 of the attached report, the Town Council believes that policies TTV26 and TTV27 of the Joint Local Plan apply, with full weight, to this proposal. The Town Council believes that the proposal conflicts fundamentally with Policy TTV27, a policy designed to *enable* (not 'restrict' as the applicant argues) the provision of homes in locations where, otherwise, they would be restricted. Contrary to Section 38(6) of the 2004 Act, the applicants have not shown any material consideration to indicate why TTV27 should not be given full weight.
- 2 The proposal does not constitute sustainable development for the 3 reasons below and set out in detail in Chapter 3 of the attached report . It follows that neither the presumption in favour of sustainable development nor the 'tilted balance' applies and, since the applicant has shown no material considerations why the conflict with JLP policies DEV10 and TTV27 should be set aside, the application should be refused:
 - The site is in an unsustainable location which encourages the use of the private car. There is no safe and easy pedestrian or cycle access between the site and the services of Tavistock Town Centre, schools and other community facilities and services and the application contains no measures to mitigate this. The proposal also makes it difficult for bus services to operate. It is, therefore in conflict with policy DEV10 of the JLP and with the policies and principles of the NPPF, especially para 110.
 - The proposal does not incorporate the housing mix set out in policy TTV27 of the JLP. The applicants have not demonstrated why, in the context of an affordable housing crisis recognised and evidenced at National, County, Borough and Town levels, 70% Open Market Housing is preferable to the maximum of 40% Open Market Housing required by the JLP policy TTV27. It does not, therefore, meet the requirements of both policy TTV27 of the JLP and the NPPF to meet identified local housing needs – a prerequisite for any sustainable housing proposal.
 - All matters other than means of access are reserved, and no mechanism exists to bind a permission to the principles and 'promises' made in the illustrative drawings

and the Design and Access Statement. Therefore, the local planning authority cannot be confident that the proposal will deliver sustainably designed development

- 3 For the reasons set out in Section 4 of the attached report, cumulatively with other committed developments at Callington Road and Plymouth Road and other potential developments coming forward, the development is likely to have adverse impacts on the transport network, especially in the following locations:
- a) Godolphin (Abbey Bridge) junction
 - b) Bedford Square junction
 - c) Drakes Statue junction
 - d) Pixon Lane/ A386 junction
 - e) Morrisons Junction
 - f) Tiddy Brook junction
 - g) Anderton Lane/A386 junction
 - h) Pixon Lane/Whitchurch Road junction
 - i) Anderton Lane/Whitchurch Road junction
 - j) Whitchurch Road which, practically, operates as a single lane road with passing places.

The applicant has not carried out any assessment at all of b-j above, despite demonstrating that significant amounts of the development's traffic will pass along these routes and through these junctions. It should be noted that the Town Council believes that the applicants have severely underestimated the amount of traffic generated by the development (115 vehicles per hour rather than the applicants' 75 vph). Consequently, the application contains no proposals to mitigate the impact on these junctions, including potentially 'severe' impacts on junction a) above and on the Mount Tavy Road/Stannary Road junction. It is, therefore, contrary to paragraph 116 of the 2024 NPPF, Policy TR6 of the draft NPPF (December 2025) and policy DEV29 of the JLP.

The Town Council requests the County Council to require the applicant to reassess their trip generation rates and to prepare full assessments of the impact of their development (along with other committed and potential developments) on the junctions set out above.

- 4 The applicants seriously underestimate the impact of the development on the highway network in a number of ways.
- The Transport Assessment grossly overestimates the potential for pedestrian movements during the peak hours – these should be reassigned to other modes
 - The bus service is less than adequate and the proposal to reroute the service through roads 5.5 metres in width (rather than 6 metres) is unacceptable
 - The Transport Assessment erroneously assigns considerable movements to Vigo Bridge Road. These should be reassigned to the A386(S)
 - The traffic surveys were carried out in an atypical month - November
 - The TEMPro Model does not take account of the level of growth required by the NPPF
 - The TRICS vehicle trip rates used are seriously underestimated and should be closer to 0.8 rather than 0.5.

Thus, the Town Council believes that the Transport Assessment's conclusions cannot be relied on and are unsafe, grossly understating the impact of the development on the town's fragile highway system.

- 5 If the applicants were to correct the error relating to Vigo Bridge Road, reassign the pedestrian movements to car movements and select more appropriate trip rates, then the impacts on junction A and the Mount Tavy Road/Stannary Bridge Road junctions would treble, leading to gridlock. This would bring the development's impact into the into the 'severe' category. This alone merits refusal in terms of paragraph 116 of the NPPF.

6 The applicants have not assessed the potential for harmful impact of this development (cumulatively with other committed and potential developments) on:

- The vitality and viability of the Town Centre
- The fabric of the World Heritage Site (including recent public enhancements). This is an asset of “the highest significance ... internationally recognised to be of Outstanding Universal Value” (paragraph 202 of the NPPF)

Specifically, the applicants have not explored the potential for harm caused to the World Heritage site at the B3357 Mount Tavy Road/ A386 Stannary Bridge Road T-junction and the Godolphin roundabout junctions both of which already exceed their theoretical capacity. Furthermore, the applicant has put forward no proposals to mitigate that harm, contrary to paragraphs 212 et seq of the NPPF.

B To advise Full Council at its meeting of July 28th 2026 to urge Devon County Council, as a matter of urgency, to prepare a traffic model covering Tavistock to enable current and future developers to carry out adequate assessments of their development cumulatively with other committed and potential developments and to involve the Town Council in the development of this model..

C To advise Full Council at its meeting of July 28th, 2026, to request WDBC, if that Council is inclined to approve the application, to impose the following condition:

“Submissions for approval of any reserved matter must be made not later than the expiration of 18 months beginning with the date of grant of outline planning permission.

The development to which this permission relates must be begun not later than whichever is the later of the following dates:

(i) the expiration of two and a half years from the date of the grant of outline planning permission; or if later

(ii) the expiration of one year from the final approval of the reserved matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Reason: To comply with Sections 91 and 92 of the Town and Country Planning Act, 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004 and to ensure that the development will contribute to reducing the shortfall in West Devon’s 5-year housing land supply”

Cllr G Parker

July 5th, 2026