

October 26<sup>th</sup> 2024

## **Representation relating to the Regulation 16 Draft Tavistock Neighbourhood Development Plan**

Dear Sirs,

### **1 INTRODUCTION**

- 1.1 I am a qualified and experienced Town Planner. I have 20 years' experience in local government, including Head of Policy, Conservation and Design for Bristol City Council.
- 1.2 For 25 years, I ran several planning consultancies, working for private clients, local authorities, government departments, and local residents' and business groups. I have appeared in over 120 public inquiries and courts.
- 1.3 As a West Devon Borough Councillor between 2015 and 2019, I was Lead Member for Planning and was a member of the Joint Local Plan Steering Group, Chairing the Group as the JLP went through its final stages.
- 1.4 Currently, I am a Tavistock Town Councillor.
- 1.5 I am making this submission as a private citizen, not in any capacity as a local councillor and my opinions are personal, not representing the views of Tavistock Town Council.

### **2 AMENDMENT SOUGHT AND SUMMARY OF REASONING**

- 2.1 Advised by West Devon Borough Council (WDBC), the NDP Steering Group has clearly been led to believe that there is no need for additional housing to serve Tavistock beyond the sites allocated in the Joint Local Plan (JLP).
- 2.2 I submit that, contrary to that advice, the evidence is that there is a Housing Crisis in Tavistock which will require the construction of many new homes additional to those allocated to Tavistock in the JLP. There is insufficient land within the built-up area of Tavistock to accommodate the likely need for additional housing, so that many of these new homes will need to be built in countryside.
- 2.3 I agree with the Assessor for the MACK Neighbourhood Plan Development Plan (Milton Abbot Grouped Parish Council) who stated very clearly "... I place great weight on the fact that one of the purposes of Neighbourhood Plans is to allow the community to decide what sites should be developed."
- 2.4 I accept that it is too late in the process, and probably inappropriate, for the NDP to consider allocating specific sites. However, I believe that it is important to indicate to the people of Tavistock and to potential developers what policy principles will apply to proposals for housing within the built-up area of Tavistock and in countryside. As things stand, between them, the JLP and NDP does not do this – on the contrary, they have created sheer confusion.
- 2.5 Ideally, as with the recent MACK NDP, the Tavistock NDP would contain a two-pronged policy:  
**"Settlement Boundary**  
**Within the settlement boundary, as shown on the Settlement Boundary Map, there will be a presumption in favour of housing development, subject to compliance with development plan policies.**  
**Outside the settlement boundary there will be a presumption against residential development unless the proposal meets the requirements of Local Plan Policy TTV26 or Policy TTV 27"**
- 2.6 Historically, Tavistock Town Council supported such an approach. However, on July 30<sup>th</sup> 2024 the Council reversed its previous stance and decided not to pursue a policy identifying a Settlement Boundary.
- 2.7 I continue to believe that adopting a Settlement Boundary is the appropriate policy response to the Housing Crisis in Tavistock. However, although I am making this submission as a private citizen, I am also a serving Town Councillor and I cannot, in accordance with that Council's Code of Conduct, urge the Assessor to go against that decision.

2.8 Therefore, as an alternative, I am seeking the addition of a NDP policy that clarifies that policies TTV26 and TTV 27 of the JLP will apply to sites outside the built-up area of Tavistock without involving a Settlement Boundary.<sup>1</sup> A variation of the MACK policy would address this, along the lines of:

**“Within the built-up area of Tavistock, there will be a presumption in favour of housing development, subject to compliance with development plan policies.**

**Outside the built-up area of Tavistock there will be a presumption against residential development unless the proposal meets the requirements of Local Plan Policy TTV26 or Policy TTV 27”**

- 2.9 Of course, such a Policy ought not to be necessary since the JLP sets out very clearly the different policies for development within the built-up area and the countryside. In particular, policy TTV27 sets out a clear process, enabling the development of Rural Exception Sites to provide local needs housing. The principal distinguishing element of this policy is that it restricts the amount of ‘open market’ housing to 40% and maximises the promotion of Affordable and other local need housing.
- 2.10 However, as set out in detail below, in 2020, through their Supplementary Planning Document, WDBC effectively rewrote the JLP policy approach and disappplied it in relation to Tavistock and other towns and villages in West Devon and South Hams.
- 2.11 There is, therefore, no longer a mechanism for identifying ‘Exception sites’ in Tavistock. The definition of ‘countryside’ and sites ‘adjoining the built-up area’ is now subject only to the whim of WDBC officers with no involvement of the people of Tavistock, or even the Town Council.
- 2.12 There is clearly a case for arguing that the SDP has rewritten the JLP and, therefore, is ‘ultra vires’. However, in the past 4 years, no-one has made that case and WDBC seems indifferent to putting the situation right.
- 2.13 If the Assessor believes that the JLP process is the correct approach, even without a Settlement Boundary, then it can be put right by the adoption of a confirmatory policy in the NDP as set out in 2.8 above. As a part of the statutory Development Plan, this would override the SDP.
- 2.14 The following sections put flesh on the bones of the above summary. I would be happy to elaborate on any aspect if the Assessor wishes.

### **3 HOUSING NEED IN TAVISTOCK**

- 3.1 The JLP does not set any housing target for Tavistock. It simply makes 6 site allocations - all of which were either carried over from previous plans or already had planning permission.
- 3.2 Although the NPPF requires the local planning authority to respond to a request from the NDP Team to provide an indicative housing target for Tavistock, the Reg 14 Consultation Statement states, effectively, that “We don’t do that – we only look at the whole area”:
- “Housing needs figures are expressed across the Joint Local Plan area, and one of the key benefits of planning jointly across local authority areas is the ability to monitor and report on housing supply across the plan area, rather than just a parish or local authority level.”** (Page 149 of the Reg 14 Consultation Statement)
- 3.3 Despite the absence of a local target, WDBC has been able to conclude (page 33 of the draft NDP):

**“Data provided by WDBC states that since the JLP’s adoption, relating to the quantum of development required at the town (not just the parish) a total of 470 dwellings have been completed (built), with a further 104 currently under construction and 687 with planning permission and not yet started. This equates to a total of 1,261 either completed, being built or committed, more than the minimum figure stated in the JLP for the plan period to the year 2034. This suggests that there is no real priority to allocate additional housing sites as the minimum JLP amount has already been reached with 10 years of the Plan period remaining and it is expected that other, windfall, sites will come forward in that time. The policies in this**

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<sup>1</sup> On page 33, the draft NDP states, “The Joint Local Plan allocates a minimum of 1,203 new dwellings for the town (both inside the parish boundary and adjacent) across six development sites”. This is a misinterpretation of the JLP, which bases its policies on assessment of sites within, outside or adjacent to the *built-up area*, not the parish boundary, which is an entirely different entity.

**Plan and the JLP can give sufficient direction to potential places in the parish which could be suitable for development.”**

3.4 The statements contained in this paragraph are worth examining in some detail.

**Requirements and delivery**

3.5 It is agreed by all parties that there is no specific ‘housing requirement’ for Tavistock, only a series of 6 site allocations in the JLP amounting to 1193 homes (not 1203 as in the NDP).

3.6 However, two of these sites are not the subject of full planning permissions:

- The major part of the Plymouth Road site, comprising 256 houses, has no permission at all. The previous permission has lapsed and there is no valid application submitted at the moment.
- The Tors development at Callington Road has ‘stalled’ at 399 homes, with no indication from the developer - 11 years after Outline consent was granted - that any further homes will be built.

Site	JLP Allocation	Extant Planning Permission	Committed or completed	Uncommitted cf. JLP
Callington Road	600	750	399	201
New Launceston Road	148	148	148	0
Butcher Park Hill	110	110	110	0
Plymouth Road	300	44	44	256
Trendle	12	12	12	0
Brook Lane	23	23	23	0
<i>Total</i>	<i>1193</i>	<i>1087</i>	<i>736</i>	<i>457</i>

3.7 Currently, therefore, there is a shortfall against the JLP Allocations of some 457 homes. There is every indication that an application will be forthcoming for the Plymouth Road site but no evidence to that effect in respect of the Tors.

3.8 Thus, at the time of publishing the Reg 16 NDP, the statement “**This equates to a total of 1,261 either completed, being built or committed, more than the minimum figure stated in the JLP for the plan period to the year 2034**” is factually wrong.

**Affordable Housing**

3.9 Very recently, WDBC declared an Affordable Housing Crisis. At page 6, the Reg 16 NDP refers to, and appears to accept the reality of, this crisis in respect of Tavistock.

3.10 The NDP Team commissioned Aecom to prepare a Housing Needs Assessment (HNA) to inform the Plan.

3.11 That Assessment made a background assumption that every site allocated in the JLP will achieve 30% Affordable Housing, as required by the JLP. That would produce 358 Affordable Homes.

3.12 This, it is said in para 1.19 of the HNA, provides less than half of the 841 Affordable Homes identified as being needed in the period to 2034, namely 324 Affordable for rent and 517 Affordable as a route to ownership. (Paras 1.15 and 1.18 of the HNA). On the basis of those figures, the shortfall would be 841-358 = 483.

3.13 In reality, however, only 161 affordable homes have been secured by committed developments. This is a provision of 22%, rather than the 29% estimated by the HNA:

- The Brook Lane and Trendle developments provide 30% (12 homes)
- The Butcher Park Hill development provides 40% Affordable Housing (44 homes)
- The New Launceston Road development provides 25% Affordable Housing (37 homes)
- The Callington Road development is only required to provide 17% Affordable Housing (68 homes from the 399 granted full permission).
- Amazingly, the Baker Estates development at Plymouth Road is required to provide no Affordable Housing at all.

- 3.14 If the remaining site at Plymouth Road produces, at 30%, 77 Affordable homes, this figure of 161 would rise to 238 Affordable homes.
- 3.15 In summary, the shortfall of 483 Affordable Homes identified by the HNA is likely to be an underestimate. Including the Plymouth Road site, that shortfall is likely to be 603 homes.
- 3.16 This certainly validates the views of West Devon and Tavistock Councils that Tavistock is experiencing a Housing crisis and strengthens Aecom's already strong advice in the HNA that "every effort should be made to maximise delivery where viable."

### **Government Housing Target**

- 3.17 On the day that the draft NDP was ratified by Tavistock Town Council, July 30<sup>th</sup> 2024, the government published its new housing targets.
- 3.18 By the time that the Reg 16 draft had been published, these targets had been known to the local authorities for some 6 weeks, yet nothing is said in the NDP documentation.
- 3.19 The government has set a new target for West Devon, increasing the JLP's annual minimum requirement of 160 p.a. to 446 p.a.
- 3.20 These targets are not yet set in stone. However, if this figure was to prove to be the final target, then that would imply a need to complete an *additional* 2860 homes in West Devon in the next 10 years.
- 3.21 If those homes were to be distributed in around West Devon in the same proportion as envisaged in the JLP, then Tavistock could be expected to be required to accommodate as many as 1000 new homes.

### **Housing need - Summary**

- 3.22 Bringing these elements together, there are 3 known elements of housing need facing Tavistock:
- A potential shortfall of 200 homes against the JLP allocations (2014-2034) arising from the 'stalling' of the Callington Road Development
  - A potential requirement for an additional 1000 new homes in the next 10 years arising from the government's new housing target
  - A likely shortfall of around 600 Affordable Homes in the next 10 years.
- 3.23 Whether or not these figures turn out to be exact is not the issue. It is the general scale that matters - there is a very real prospect that there will be pressure for additional large-scale housing in Tavistock in the near future.
- 3.24 This is a prospect that the NDP does not face at all. Rather, it chooses to take the view that "there is no real priority to allocate additional housing sites as the minimum JLP amount has already been reached with 10 years of the Plan period remaining and it is expected that other, windfall, sites will come forward in that time."

## **4 THE WAY FORWARD FOR THE NDP**

### **The JLP approach**

- 4.1 Most of Tavistock Parish is in Countryside, as defined by the JLP.
- 4.2 One of the principal aspects of the JLP is to achieve a sustainable distribution of development across the Plan Area by distinguishing between what development will be encouraged within built up areas and what will be encouraged within countryside.
- 4.3 In particular, Policy TTV26 sets out the parameters for development in the countryside and TTV27 explains how 'Exceptions' can be made for housing developments that meet local housing needs in locations well related to the built-up area.
- 4.4 Given the importance of this strategic approach to a rural/urban area such as Tavistock, it is important, for local communities, authorities and developer teams to understand how and where these policies are to be applied in the NDP Area. It is even more important in view of the extent of local housing need evidenced above.

- 4.5 It is surprising, therefore, that neither the draft NDP itself nor the Basic Condition Statement attempts to indicate how the NDP takes these important JLP policies forward. Indeed, although there is a single passing reference on page 35 of the draft NDP, the Basic Conditions Statement mentions neither of policies TTV26 or TT27 at all,

### **General NDP approach**

- 4.6 One of the purposes of the Neighbourhood Plan is to enable the community of Tavistock to express a view as to where developments should be located.
- 4.7 The NDP does not set out to allocate sites and I understand why. There is so much uncertainty about future housing need, and the scale of the likely pressures for development are so large that they must be considered to be 'strategic'. It is right and proper, therefore, that allocations should be dealt with in a Review of the JLP which, I understand, is under way.
- 4.8 However, in the meantime, it is entirely possible – even likely - that proposals will come forward for housing development justified both by the new government targets and by the Affordable housing need identified in the HNA.
- 4.9 The NDP is very confident that **"The policies in this Plan and the JLP can give sufficient direction to potential places in the parish which could be suitable for development."**
- 4.10 With the best will in the world, those sites will not be within the built-up area of Tavistock. There are simply not sites sufficiently large or numerous enough to accommodate these identified needs. Self-evidently, they will be outside the built-up area, in countryside. But how will they be identified?
- 4.11 Had the Town Council decided to adopt a Settlement Boundary in the style of the MACK NDP, then the answer would have been straightforward – they would have been identified by use of the Boundary and the criteria in JLP Policy TTV27.
- 4.12 However, that ship, as they say, "has sailed" and, in the absence of such a NDP Policy, the situation is infinitely more complex.

### **The JLP Approach**

- 4.13 A couple of weeks after the Town Council meeting of July 30<sup>th</sup>, in his confusion, a councillor wrote the following to the WDBC Officer who advised the NDP Group, asking the following question:
- "In the absence of a Settlement Boundary, if developers come forward with housing proposal(s) for Tavistock, could you please explain what criteria will WDBC use to determine whether the site/s involved are to be treated as Exception Sites under Policy TTV27, and will any local councillors be able to be involved in these decisions?"**
- 4.14 The officer's response was very clear:
- "As a starting point, any development proposal is potentially subject to all of the policies of the development plan (the JLP and any NP that is in place), and another principle is that each case is dealt with on its merits. For developer-led proposals for housing schemes the key policies would include JLP Policies SPT1, SPT2 and TTV27. The JLP allocated sufficient sites to meet the housing need that was identified for the plan period, including sites at Tavistock. Given that some of these allocated sites are still in the process of being delivered and that we can demonstrate a 5-year supply of housing land, I anticipate that any site of such a scale as you imply (if developers come forward with housing proposal(s) for Tavistock) would be subject to Policy TTV27 – as such a site 'would not otherwise be released for this purpose'.**
- Such a housing developer-led proposal would likely be regarded as a 'departure' from the plan and as an 'exception' to the JLP's strategic approach to delivering housing in Tavistock (the allocated sites). As such, it would be judged against the criteria set out in Policy TTV27. I am sure that local Members would be informed of and have the opportunity to engage with any pre-application discussions, and would be involved with any planning application process as per standard practice."** (The highlights are mine)
- 4.15 As an aside, I am sure that the Assessor will note that, since the JLP contains a specific provision for developments on 'Exception' sites, such a proposal could not be considered as a 'departure'.
- 4.16 The officer correctly explains that, following the JLP, proposals in countryside, but on sites adjoining the built-up area, can be assessed against the criteria of TTV27 – the 'Exception sites' policy – using the following sequence of questions.

*Question 1*

- 4.17 Is the proposal on a site 'within' or 'outside' the built-up area?
- If it is within the built-up area, it would be subject to the presumption in favour of sustainable development and the 'normal' Development Management policies, based on policies SPT1 and SPT2.
  - If it is outside the built-up area, it would be subject to the provisions of Policy TTV26 – the 'Countryside' policy.

*Question 2*

- 4.18 If it is in countryside, does the proposal meet the requirements of TTV26?
- 4.19 Part 1 of TTV26 relates only to 'isolated' development. It will not come into play in relation to 'Exception' sites since, by definition, such sites must adjoin or be well related to a settlement.
- 4.20 Part 2 of TTV26 comprises a series of requirements that apply to *all* proposals in Countryside:
- "2. Development proposals should, where appropriate:**
- i. Protect and improve public rights of way and bridleways.**
  - ii. Re-use traditional buildings that are structurally sound enough for renovation without significant enhancement or alteration.**
  - iii. Be complementary to and not prejudice any viable agricultural operations on a farm and other existing viable uses.**
  - iv. Respond to a proven agricultural, forestry and other occupational need that requires a countryside location.**
  - v. Avoid the use of Best and Most Versatile Agricultural Land.**
  - vi. Help enhance the immediate setting of the site and include a management plan and exit strategy that demonstrates how long term degradation of the landscape and natural environment will be avoided."**
- 4.21 If a proposal accords with these requirements, then, subject to the normal Development Management requirements (design, landscaping, access etc) it can proceed toward approval. If it does not, then it conflicts with TTV26 and can be expected to proceed toward refusal.

*Question 3*

- 4.22 Is the subject a housing proposal that conflicts with TTV26 on a site adjoining or very near to a settlement "**which would not otherwise be released for this purpose**".
- 4.23 Such sites can, under the terms of Policy TTV27, be granted approval as "Exception sites." TTV27 is designed specifically to meet local housing needs and, since Tavistock has an identified need for both open market and Affordable Homes in the next 10 years that cannot be met on sites within the town's built-up area, TTV27 will be extremely important to our future:
- "TTV 27 Meeting local housing needs in rural areas**
- Proposals for residential development on sites adjoining or very near to an existing settlement which would not otherwise be released for this purpose may be permitted provided that it can be demonstrated that:**
- 1. It meets a proven need for affordable housing for local people.**
  - 2. It includes a mix of affordable and market housing products where necessary to be financially viable. This includes open market housing, providing it does not represent more than 40 per cent of the homes or 40 per cent of the land take excluding infrastructure and services.**
  - 3. Management of the scheme will ensure that the dwellings continue to meet the identified need in perpetuity.**
  - 4. The proposal meets the requirement of all other relevant policies of the Plan."**
- 4.24 Thus, the route to a successful "Exception site' proposal is fairly straightforward, through Policy TTV26 and, as explained by the WDBC Officer, the relevant criteria are set out in TTV27:

## 1 The site

- Is the site in countryside, subject to policy TTV26?
- If “Yes”, is it adjoining or very near to an existing settlement?<sup>2</sup>
- If “Yes”, would it otherwise not be released for housing?

## 2 The proposal

- Does the proposal meet a proven need for affordable housing for local people?
- If “Yes”, does the proposal restrict open market housing to less than 40 per cent of the homes or 40 per cent of the land take?
- If “Yes”, will the scheme ensure that the dwellings continue to meet the identified need in perpetuity?
- If “Yes”, does the proposal meet the requirement of all other relevant policies of the Plan?

4.25 On a ‘clean’ reading of Policies TTV26 and TTV27, therefore, the officer’s explanation of the JLP methodology for identifying “Exception sites” is correct and accords with what he told the Steering Group and Town Council. However, reality is very different.

### The 2020 Supplementary Planning Document

4.26 In July 2020, WDBC adopted a S.P.D to explain how and where WDBC proposes to apply the policies of the JLP.

4.27 The section with which I am particularly concerned is in Section 11, headed “Development in the countryside (TTV26)”, which completely changes the JLP process for Tavistock.

4.28 Paragraph 11.44 succinctly restates the purpose and application of JLP Policy TTV26:

**“11.44 Policy TTV26 seeks to protect the special characteristics and role of the countryside from inconsistent and inappropriate development that could undermine the rural character and settlement pattern of the TTV Policy Area. The broad spatial strategy of the JLP seeks to direct the vast majority of development to named settlements within the settlement hierarchy. Provision is made within the policy for supporting proposals that can demonstrate why a countryside location is required; these policy tests are necessarily high, and emphasise that development in the countryside should occur only in exceptional circumstances.”**

4.29 Paragraph 11.45 sets out that “professional judgement” will be used to determine what comprises a ‘built-up area’:

**“11.45 Paragraph 5.5 of the JLP indicates that TTV26 will be applied ‘outside built-up areas’. In conjunction with TTV1, a pragmatic approach will be taken to where TTV26 applies. Professional judgement will be informed by the rural settlement pattern and other factors when considering what can be considered a ‘built-up area’...”**

4.30 Paragraph 11.46 appears to go even further. It seems to completely negate both the intent and the JLP process set out by the officer in his email by disapplying policy TTV26 altogether in respect of sites adjoining Tier 1 (including Tavistock), Tier 2 and Tier 3 settlements<sup>3</sup>:

**“11.46 Sites adjoining settlements in the top three tiers of the settlement hierarchy: the main towns; smaller towns and key villages; and sustainable villages, *may not be considered against the requirements of TTV26 if the proposal accords with policies SPT1 and SPT2, benefits from good connectivity with local services and relates well to the existing built form of the settlement, including being at an appropriate scale. Providing a site is not considered to be rural in character this approach will enable a small amount of development<sup>4</sup> to be directed towards more sustainable settlements within the TTV policy area, which is a key aim of the spatial strategy. Proposals of this type will still be considered against all other policies in the plan.”* (My emphases)**

4.31 Unless it was intended to change the JLP approach to ‘Exception Sites’, there would have been no reason for the S.P.D to say anything at all. I anticipate that WDBC may attempt to finesse the meaning of “may not” to mean “might not”, implying a measure of flexibility in

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<sup>2</sup> In Bere Ferrers, North Tawton, Bridestowe, Highampton, Milton Abbot and Sourton which all have adopted Settlement Boundaries in ‘Made’ NDPs, this is a straightforward judgement. Likewise, in Okehampton and Lamerton, whose emerging NDPs include the adoption of Settlement Boundaries. All of these have the explicit support of WDBC.

<sup>3</sup> In an extremely confusing twist, paragraph 11.47 appears to *reapply* policies TTV26 and TTV27 to sites in Tier 3

<sup>4</sup> There is no restriction on the size of an Exception Site and, so, no basis for the qualification that this policy would be limited to a “Small amount” of development. It could equally well be used to justify major developments.

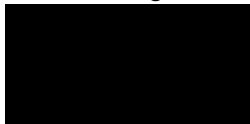
application of policies TTV26 and TTV27. That would be nothing short of sophistry, since such flexibility is not present or even encouraged in the JLP itself.

- 4.32 Taken together with the earlier “professional judgement” provision, the introduction of a policy that a proposal “*might not* be considered against TTV26”, would introduce such uncertainty that no-one, whether developer, local community or local authority could have any notion of how a particular proposal would be dealt with. That would be the antithesis of good planning policy.
- 4.33 Paragraph 11.46 only makes any sense if the phrase “may not be considered” is given its simple grammatical meaning. In respect of a countryside site that relates well to the built-up area and a proposal that accords with SPT1 and SPT2, it means that the local planning authority **cannot** consider it against TTV26 (and therefore TTV27). This is a complete reversal of both the meaning and the letter of the JLP’s countryside policies.<sup>5</sup>
- 4.34 The Assessor will appreciate that this passage refers to the very sites that, on a ‘clean’ reading of the JLP as set out by the officer in his email at 3.14 above, should, unequivocally, qualify as “Exception sites”.
- 4.35 However, since the S.P.D reverses the JLP process, taking these sites out of TTV26 and bringing them back under the terms of Policy SPT1 and SPT2, then such sites can never possibly qualify as “Exception Sites” under TTV27.

#### **Impact on Tavistock**

- 4.36 This is not a semantic point, but an intensely practical one with important consequences for Tavistock and other Tier 1, 2 and 3 settlements.
- 4.37 The key impact for Tavistock is that, applying the Supplementary Planning Document approach, no proposal on a site adjoining or well-related to the built-up area can be required to provide the levels of Affordable Housing required by TTV27. The S.P.D, effectively halves the amount of Affordable Housing that would, on the ‘clean’ application of the TTV27, be required to help Tavistock through its Affordable Housing Crisis.
- 4.38 Given the acknowledged scale of that crisis in Tavistock, this is a very serious adverse impact indeed.
- 4.39 That makes it most surprising – even inexplicable - that these provisions of the S.P.D are not even mentioned in the officer’s email at 3.14. Furthermore, in 4 years, WDBC never seems to have mentioned the S.P.D approach to the NDP Steering Group. It was certainly not highlighted to the Town Council on July 30<sup>th</sup>, 2024, when this same officer spoke strongly against the adoption of a policy adopting a Settlement Boundary for Tavistock and confirming the application of the provisions of Policies TTV26 and TTV27 to sites outside the built-up area of the town.
- 4.40 At the very least, therefore, I ask the Assessor to recommend a new policy in the terms set out in paragraph 1.8 above, the effect of which would be to confirm the application of policies TTV26 and TTV27 to sites outside the built-up area of Tavistock.

Kind Regards



Graham Parker Dip TP

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<sup>5</sup> By rewriting JLP policies TTV26 and TTV27 in this way, this part of the S.P.D. may not be lawful. The Town Council objected to it in 2020, but was ignored without explanation by the officers.