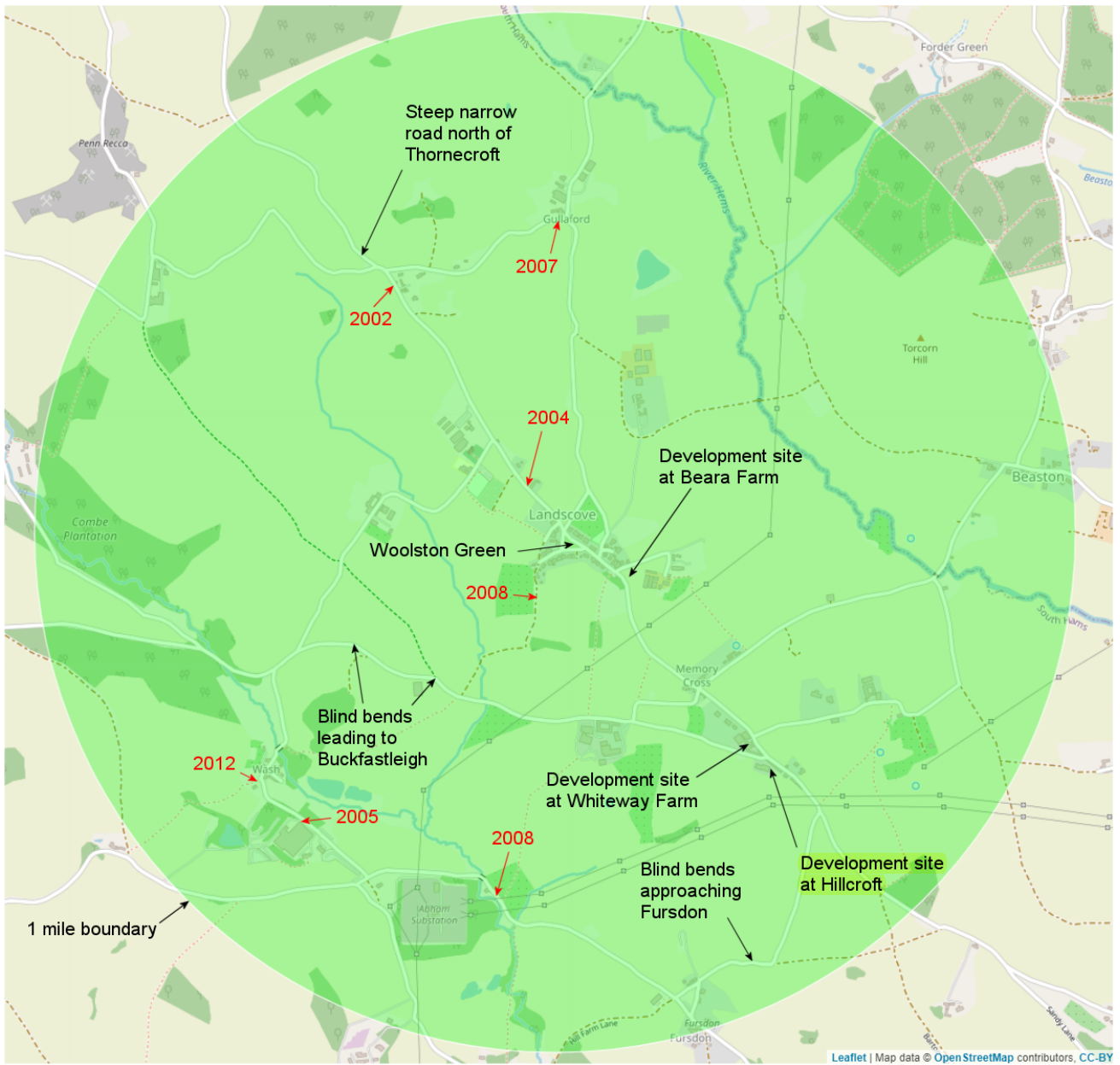


Superscripts denote page numbers.

Pertinent text in illustrations is highlighted with a yellow background.

1. I am 64 years old and have lived within 0.4 miles of the proposed development site for 17 years. During this time my unassisted bicycle has been my main means of transport which I use on a frequent and regular basis to reach services and amenities in Totnes, Buckfastleigh and Ashburton.
2. As a minimum requirement, in any community in which new housing is being incrementally added there must be reasonable scope to provide infrastructure which promotes the use of active transport to offset any safety concerns from the additional cars which the new housing will introduce onto existing roads. In the case of the site for which planning permission is being sought ²⁻⁶, the cost of providing such infrastructure will be prohibitive. Building new houses at locations which will be detrimental to the use of active transport goes against planning policy. Plymouth and South West Devon Joint Local Plan adopted in March 2019 states the following in clause DEV29 - "Specific provisions relating to transport". New homes should be located in locations that can enable safe, secure walking, cycling and public transport access to local services and amenities ^{7,8}.
3. This development does not satisfy that requirement. Local roads are woefully inadequate in terms of width, according to the County's Highway Authority ⁹, and have a history of accidents involving injury according to Department for Transport records of Police submissions ^{2,10,11,12}.
4. As such this development will add traffic to a woefully inadequate road network without any provision to improve existing roads for active transport users or provide any alternative routes which are segregated from car traffic. Since my main means of transport is the bicycle, it is the unsuitable location of the site and the associated failure to provide a secure and safe environment for active transport users to reach local services and amenities that most affects me. This has been my main motivation for submitting this comment and objection. However I see that this development also fails to deliver the majority of the ten items listed in Dev29 - Specific provisions relating to transport. Namely it fails to deliver Items 1, 5, 7, 8, 9 and 10 ⁷. These provisions cater for the interests of all road users and not just those of active transport users.



Title: Location of housing developments, road sections where care is needed, and accidents involving personal injury

Key: Dates in red denote dates of accidents submitted by the police to the Department for Transport involving personal injury between 2002 and 2012. This data is illustrated by Crashmap at www.crashmap.co.uk.

Source: <https://www.freemaptools.com/radius-from-uk-postcode.htm>

Mr Graham Beer
Barn 1 at Hillcroft, Landscope, Totnes TQ9 6GY

Building Ref.	Description/Evidence
1	<p>Exterior – the building is derelict having previously been used to house livestock. It can be divided into two sections, comprising the original stone barn at the western end and a more modern flat roof and breeze block section at the eastern end.</p> <p>The western section is open to the eaves with exposed wooden beams (both original and more modern) and a pitched roof with corrugated tin roofing sheets which have slipped and are missing in places. The walls are a mixture of stone and brick with metal and wooden clad sections. There is extensive ivy growth on the western gable end and developing scrub which obscures the exterior at the south and western elevation.</p>

Title: Ecological Impact Assessment (Bats and Birds) August 2021

Source: <https://portal.southhams.gov.uk/CivicaTownLive/civica/Resource/Civica/Handler.ashx/doc/pagestream?DocNo=8503953&pdf=true>

Details

Planning Application Ref: 0146/18/FUL

Applicant Name: ATA Estates (Staverton) LLP

Description: Works to convert 8 storage buildings to 8 dwellings pursuant to Town and Country Planning (General Permitted Development)(England) Order 2015, Schedule 2, Part 3 Class P Prior Notification (50/2308/15/PNNEW)

Address: Whiteway Farm Staverton Totnes TQ9 6AL

Officer Name: Kate Cantwell

Agent Name: Mr Mark Evans

Decision Date: 23 December 2019

Conditional Approval

Application Date: 22 January 2018

Target Determination Date: 19 March 2018

Details

Planning Application Ref: 1938/23/FUL

Applicant Name: Mr Tom Pratt - ATA Estates (Staverton) LLP

Description: Subdivision of unit 6 (approved under planning consent 0146/18/FUL) into unit 6a & 6b

Address: Unit 6, Whiteways Farm Staverton TQ9 6AL

Officer Name: James Gellini

[Comment on this application](#)

Application within consultation/publicity period

Application Date: 05 June 2023

Target Determination Date: 31 July 2023

Details

Planning Application Ref: 1419/20/FUL

Applicant Name: Mr A Abrams - Landscope Eden Ltd

Description: READVERTISEMENT (revised plans received) Demolition of existing concrete barn and construction of fourteen dwellings including five for shared ownership/affordable rent (resubmission of 2176/18/FUL)

Address: Land West of Beara Farm Woolston Green Landscope

Officer Name: Jacqueline Houslander

Agent Name: Mr Michael Drake - Eden Land Planning Ltd

Decision Date: 23 December 2021

Conditional Approval

Application Date: 02 June 2020

Target Determination Date: 22 December 2021

Details

Planning Application Ref: 2104/23/FUL

Applicant Name: Veale

Description: Works to convert agricultural barn to form two dwellings (resubmission of 1022/23/FUL)

Address: Hillcroft Memory Cross To Fursdon Cross Staverton Devon TQ9 6AL

Officer Name: PI Officer

Agent Name: Mr Christopher Stacey - Christopher Stacey Architecture

[Comment on this application](#)

Application within consultation/publicity period

Application Date: 26 June 2023

Target Determination Date: 21 August 2023

Title: Planning application details for the proposed development at Hillcroft and two addition sites under current development

Source: <https://apps.southhams.gov.uk//PlanningSearchMVC/>

Postcode	Occupied Households
TQ11 0LB	4
TQ11 0LD	7
TQ13 7LE	4
TQ13 7LS	2
TQ13 7LT	3
TQ13 7LU	4
TQ13 7LX	8
TQ13 7LY	7
TQ13 7LZ	34
TQ13 7NA	7
TQ13 7NB	11
TQ13 7NE	1
TQ13 7NQ	3
TQ13 7RR	4
TQ9 6AJ	9
TQ9 6AL	6
TQ9 6AN	8
TQ9 6AW	5
TQ9 6BX	12
TQ9 6GB	1
TQ13 7FQ	0
TQ9 6GY	0
TQ11 0FA	0
TOTAL NUMBER OF OCCUPIED HOUSEHOLDS	140

Title: Number of occupied households within 1 mile of Woolston Green

Sources:

1. https://www.nomisweb.co.uk/census/2011/postcode_headcounts_and_household_estimates
2. https://www.nomisweb.co.uk/output/census/2011/Postcode_Estimates_Table_1.csv

The following shows how the number of houses being built within 1 mile of Wollston Green will increase due to houses being built at Beara Farm and Whiteway Farm.

No of households added at nearby Beara Farm development = 14 ⁴

No of households added at neighbouring Whiteway Farm development = 9 ⁴

Number of households within 1 mile of Woolston Green = 140 ⁵

Increase in the number of houses being built within 1 mile of Woolston Green

= $(14 + 9) / 140 * 100 = 16\%$

Title: Increase in the number of houses being built within 1 mile of Woolston Green

DEV29 - Specific provisions relating to transport

The Plymouth and South West Devon Joint Local Plan has now been adopted! To find out more please visit the [Plymouth and South West Devon Joint Local Plan: Adoption page](#).

Visit the [Interactive Plymouth Plan](#) to see other policies that affect decision making across Plymouth City including the Council and its partners.

Development will be required to contribute positively to the achievement of a high quality, effective and safe transport system in the Plan Area. It will promote sustainable transport choices and facilitate sustainable growth that respects the natural and historic environment. Development proposals should therefore, where appropriate:

1. Consider the impact of development on the wider transport network.
2. Provide safe and satisfactory traffic movement and vehicular access to and within the site.
3. Ensure sufficient provision and management of car parking in order to protect the amenity of surrounding residential areas and ensure safety of the highway network.
4. Limit / control the overall level of car parking provision at employment, retail and other destination locations.
5. Provide for high quality, safe and convenient facilities for walking, cycling, public transport and zero emission vehicles.
6. Mitigate the environmental impacts of transport, including impacts on air quality, noise pollution, landscape character and the quality and distinctiveness of urban and rural environments.
7. Incorporate travel planning, including Personalised Travel Planning (PTP), which helps to maximise the use of sustainable transport in relation to the travel demands generated by the development and limit the impact of the development on the road network.
8. Ensure that access and infrastructure delivered as part of the development meets the need for walking, cycling and public transport connectivity both within the development and in the wider area alongside supporting place-shaping objectives.
9. Contribute to meeting the wider strategic transport infrastructure needs generated by the cumulative impact of development in the area.
10. Locate new homes in locations that can enable safe, secure walking, cycling and public transport access to local services and amenities.

**Download the full adopted Plymouth
And South West Devon Joint Local
Plan (March 2019)**

**Plymouth And South West Devon
Joint Local Plan (pdf - 32.06 MB)**

Title: DEV29 - Specific provisions relating to transport

Source: 1. <https://plymswdevonplan.co.uk/policy/so11>
2. <https://plymswdevonplan.co.uk/policy/so11/dev29>

Plymouth and South West Devon Joint Local Plan

f. Transport and infrastructure

What we are going to do - our development policies for meeting transport and infrastructure needs

6.109 One of the most important issues in the management of development delivery is the need to ensure that the necessary infrastructure is also provided. Infrastructure includes the public systems, services, and facilities that are necessary for economic and social activity, including highways, schools, waste management facilities, telecommunications, power and water supplies. Unless infrastructure needs are met, development can be unsustainable and lead to the creation of unbalanced communities without the services and facilities they need to thrive.

6.110 This section sets out policies in relation to transport, community infrastructure and (in the case of Plymouth which is a waste planning authority) waste management.

6.111 As the population of the Plan Area grows so too will the demand for travel. The scale of growth necessitates major infrastructure investments to provide greater real travel choices with more reliable journey times, across all modes of transport alongside smarter choices measures to encourage people to try those alternatives.

6.112 In accordance with the National Planning Policy Framework the transport proposals supporting this plan are being developed such that the system is balanced in favour of sustainable travel giving people a real choice about how they travel with consideration being given to both the physical transport infrastructure needed to deliver a high quality, effective and safe transport system and the complementary behavioural change schemes.

6.113 Through encouraging and enabling more walking, cycling and use of public transport; network capacity will be released. The independently immobile will be able to access places of education, employment and training, the accessibility of key services will rise, public health will improve and environmental benefits will be achieved.

6.114 There is a significant need, and opportunity, to affect travel behaviour. Development has a key role to play in achieving the transport philosophy set out within the Plan both in terms of providing critical infrastructure and the complementary measures (either directly, or indirectly in the form of a financial contribution) by supporting residents and employees predisposed to reviewing their travel habits arising from one or more of the following factors; moving house, changing school or changing job.

ADOPTED produced by West Devon Borough Council, South
MARCH 2019 Hams District Council and Plymouth City Council

Title: Plymouth and South West Devon Joint Local Plan

Description: Transport and Infrastructure

Source: <https://www.plymouth.gov.uk/sites/default/files/JLPAdoptedVersion.pdf>

Pages: 290-292

PLANNING APPLICATION REPORT

Case Officer: Ben Gilpin

Parish: Staverton

Application No: 50/2308/15/PNNEW

Agent/Applicant:

James Wells Planning Ltd
Top Floor Unit
2 Western Hangar
Lawrence Road
Mount Batten
Plymouth
PL9 9SJ

Applicant:

Mrs K James
c/o agent

Site Address: Whiteways Farm, Staverton, Totnes, TQ9 6AL

Development: Prior approval for change of use from storage or distribution (Class B8) and any land within its curtilage to 9no. dwellinghouse (Class C3)

Recommendation:

Prior Approval Not Required

- County Highways Authority

No objection:

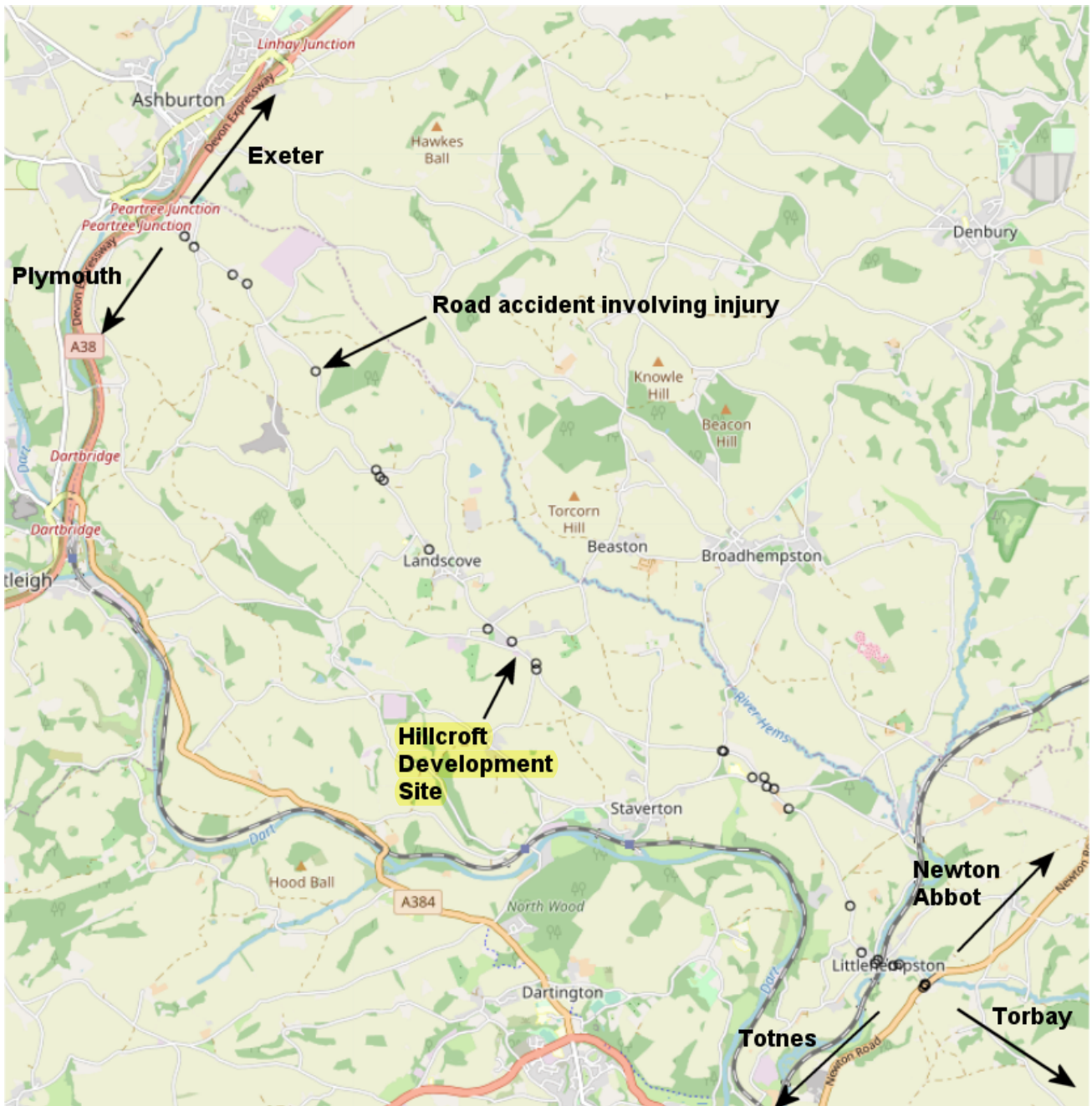
Whilst the direct vehicle access to the site is reasonable from a safety perspective, the roads leading to the site are woefully inadequate in width terms. I have interrogated TRICS and a standalone B8 distribution use class generates 1.3 trips per 100m² of GFA. Looking at the proposed layout it appears that the total GFA change of use to residential is 1612m². So the existing site would have generated around 21 trips per day. A dwelling generates around 5 daily vehicle movements per day according to TRICS so 9 dwellings would be a total of around 45 two way trips per day. This leave a net increase of around 24 daily vehicle trips. I must have regard to the benefits the proposals would have in terms of reduced HGV movements to and from the site, should the buildings be converted. I think at appeal it would be argued there would be a significant reduction in HGV type traffic. Based on this the Highway Authority would be wise to accept an increase in residential car size traffic in exchange for the reduced HGV movements.

24 two way trips does not seem an unreasonable increase noting that equates to a worst case of an extra 2-3 vehicles in the peak hours/ day. I note there is reasonable forward visibility for drivers getting to and from the site so whilst the roads are narrow, drivers can drive to the conditions and if needs be reverse to safe passing spaces should they meet oncoming cars.

Title: County Highways Authority decision in the Decision Notice for Planning Development 50/2308/15/PNNEW at Whiteway Farm dated 13 October 2015

Sources:

1. <https://apps.southhams.gov.uk/PlanningSearchMVC/Home/Details/152706>
2. <https://portal.southhams.gov.uk/CivicaTownLive/civica/Resource/Civica/Handler.ashx/doc/pagestream?DocNo=3558774&pdf=true>



Title: Road accidents involving injury submitted by the Police to the Department for Transport 1979 - 2021

Description: Accidents are shown by black circles along a route to main roads which lead to large communities.

- Sources:**
1. <https://www.data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-safety-data>
 2. <https://data.dft.gov.uk/road-accidents-safety-data/dft-road-casualty-statistics-accident-1979-2021.csv>
 3. <https://gridreferencefinder.com/batchConvert/batchConvert.php>
 4. <https://www.freemaptools.com/concentric-circles.htm>

Here's how CrashMap works:



Department
for Transport

Official data is
published by
Department for
Transport

We only use official data published by the Department for Transport which is based on records submitted to them by police forces.

Our data is updated annually each summer for the preceding year, although we do receive provisional in-year updates. For more information view the [FAQ](#) section.

Personal injury accidents records

The records relate only to personal injury accidents on public roads that are reported to the police, and subsequently recorded, using the STATS19 accident reporting form.

Information on damage-only accidents, with no human casualties or accidents on private roads or car parks are not included in this data.



Title: Crashmap: How it works

Source: <https://www.crashmap.co.uk/>

Changes in safety on England's roads: analysis of hospital statistics

[Mike Gill](#), regional director of public health,¹ [Michael J Goldacre](#), professor of public health,² and [David G R Yeates](#), computer scientist²

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Associated Data

▶ [Supplementary Materials](#)

Abstract

[Go to:](#) ▶

Objective To compare trends in the numbers of people with serious traffic injuries according to police statistics and hospital episode statistics (HES).

Design Descriptive study based on two independent population based data sources.

Setting Police statistics and hospital episode statistics in England.

Main outcome measures Rates of injury and death and their change over time reported in each data source, for 1996 to 2004.

Results According to police statistics, rates of people killed or seriously injured on the roads fell consistently from 85.9 per 100 000 in 1996 to 59.4 per 100 000 in 2004. Over the same time, however, hospital admission rates for traffic injuries were almost unchanged at 90.0 in 1996 and 91.1 in 2004. Both datasets showed a significant reduction in rates of injury in children aged ≤ 15 , but the reduction in hospital admission rates was substantially less than the reduction shown in the police statistics. The definition of serious injury in police statistics includes every hospital admission; in each year, none the less, the number of admissions exceeded the number of injuries reported in the police system.

Conclusions The overall fall seen in police statistics for non-fatal road traffic injuries probably represents a fall in completeness of reporting of these injuries.

Title: Changes in safety on England's roads: analysis of hospital statistics

Source: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1489232/>