

## **OBJECTION TO INCREASING THE NUMBER OF PARKING SPACES FROM 4 to 7 AT HILLCROFT UNDER PLANNING APPLICATION 2031/24/FUL.**

From: David Hendy at staverton@jhendy.co.uk

To: <https://southhams.planning-register.co.uk/Planning/Comment/2031/24/FUL>

Date: 22<sup>nd</sup> October 2024

[Superscripts denote page numbers. Pertinent text is highlighted with a yellow background.]

1. I understand that the site of the development in this planning application lies within a Tier 4 area. Such a classification denotes smaller villages, hamlets, and the countryside, where development is usually only supported if the area meets the principles of sustainable development and sustainable communities (policy TTV1 of the JLP). In fact the site is in a location where the principle of residential development would generally not be supported <sup>3</sup>.
2. This planning application proposes the erection of two garages with access at Hillcroft Staverton TQ9 6AL. At this development site, work to convert an agricultural barn to form two dwellings was proposed and approved under Planning Application 2104/23/FUL on 12th October 2023 <sup>4</sup>. In fact construction of the two dwellings is currently in progress.
3. Proposed Floor Plans of these two dwellings downloaded from South Hams District Council Planning Register on 21st October 2024 show that each dwelling consists of 3 bedrooms <sup>5,6</sup>.
4. The Supplementary Planning Document adopted in July 2020 by West Devon Borough Council, South Hams District Council and Plymouth City Council states that indicative car parking provision within any new residential development, including residential conversions, should be 2 spaces per dwelling for 3 bedroom dwellings. <sup>7</sup> Since there are two 3-bedroom dwellings being constructed at this site, this equates to a total of 4 parking spaces.
5. In this planning application the application form states that the total number of existing car parking spaces is 4 and proposes a total of 7 which amounts to an increase of 3. As such, this application is proposing that the number of car parking spaces is increased to a number above the indicative provision stated in the Supplementary Planning Document.
6. The National Planning Policy Framework states in the section titled "Promoting sustainable transport" that transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impacts of development on transport networks can be addressed and opportunities can be pursued to promote walking, cycling and public transport use. <sup>9</sup>
7. The Plymouth and South West Devon Joint Local Plan in the section titled "Specific provisions relating to transport" <sup>10</sup> states that development proposals should consider the impact of development on the wider transport network and incorporate travel planning to limit the impact of the development on the road network.
8. If planning permission is given to increase the number of parking spaces at Hillcroft from 4 to 7 as proposed in this planning application, I believe that this will encourage the use of cars at this development. If this happens, local roads will be less safe to cycle due to increased risk of collision with cars and discourage the take up of active transport. This is at a time when there is an urgent need to reduce carbon emissions from transport in the UK of which domestic transport in 2023 was the largest source of emissions. <sup>11</sup> In view of guidance stated in planning

policies, it follows that any measure which has the potential to make roads less safe to those using more sustainable forms of transport should be strongly discouraged. Clearly this will not be achieved if permission is granted to increase the number of car parking spaces from 4 to 7 for the two 3-bedroom dwellings as proposed in this planning application.

9. I live along the same road as this development and within 500 metres of it. At this address my main form of transport to neighbouring communities such as Totnes for the last 18 years has been my unassisted bicycle. Indeed I buy my groceries each week in Totnes using my bicycle. As such I am an experienced cyclist who is well qualified to assess the safety of the local road network from a cyclist's point of view. From this experience I have learnt that the biggest threat to me on these roads when on my bicycle is car drivers who are driving too fast and unable to properly slow down when meeting me on blind bends away from any housing development. In adding provision for residents to keep cars at dwellings, it is improving facilities for keeping cars at dwellings and as such is catering for the needs of car drivers and encouraging their use in my area. This is increasing the risk of injury to me and my wife when we go out on our bicycles to reach essential services.
10. For the reasons stated above I am objecting to proposals made in the application form for this planning application.

## ANALYSIS

### Principle of Development/Sustainability:

The site is in the countryside, and lies within tier 4 of the settlement hierarchy as outlined in policy TTV1 of the Joint Local Plan (JLP).

Tier 4 is named as smaller villages, hamlets, and the countryside, where development is usually only supported if it meets the principles of sustainable development and sustainable communities (policy TTV1 of the JLP).

One objection goes into great detail about the unsustainable location of the site, and the need to occupants to be reliant on a car due to the road network and lack of suitability for cycling. This is correct, and the site is not somewhere where the principle of residential development would generally be supported. However, Officers must acknowledge that prior approval has previously been granted for conversion of the buildings to two dwellings under Part 3, Class Q of the General Permitted Development Order 2015 (as amended) (application reference 4220/20/PDM).

When considering the impact of the Class Q fallback position, Officers are mindful of the relevant case law: *Mansell v Tonbridge & Malling Borough Council*, which accepts that a Class Q prior approval can establish the principle of residential development in a location otherwise considered inappropriate and contrary to policy. However, the proposal still needs to accord with the Development Plan taken as a whole and to support an alternative scheme to that which would otherwise be delivered under the Class Q consent, the proposal needs to demonstrate that it would result in betterment compared to the development which could otherwise be delivered under the approved Class Q consent (the fallback option).

Case law has also clarified the principle that, in considering proposals for new development, decision-makers should have regard to whether or not there is a realistic prospect of the class Q fallback option taking place, should planning permission not be granted for the proposed development. In this instance, works have not yet commenced to implement the conversion, however there is nothing to indicate that it would not be implemented should this application be refused.

In summary, the principle of development can be supported, provided that the development represents betterment when compared to the conversion which could be carried out under the extant prior approval.

### Housing mix:

The proposal would result in two 3-bed dwellings. ONS data for the parish indicates that there are fewer 3-bed dwellings than the district average, and so the proposal would not be contributing to any existing imbalance in housing stock, in accordance with policies SPT2.4 and DEV8 of the JLP.

Objectors have noted that a previously-proposed fourth bedroom is now proposed as a study. The JLP allows for the provision of a study/office space to support home-working, as explained in the SPD:

Paragraph 4.17 of the Supplementary Planning Document which accompanies the JLP states that *'Home working is supported and as such the provision of one room identified as an office or study will be accepted, but other rooms that have the potential to be used as bedrooms (other than living rooms, kitchens, dining rooms, rooms with mains plumbing/toilets or rooms with no windows and/or main entrances) will be considered as such, and considered against the requirements of DEV8 on that basis.'*

When applying the guidance above, the proposed dwellings must be assessed as 3-bed properties, and no conflict with policies relating to housing mix are therefore identified.

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<b>Planning Application:</b>	2104/23/FUL
<b>Document name:</b>	Officer Report
<b>Document file:</b>	9121985.pdf
<b>Page:</b>	3 of 7
<b>Highlighted text:</b>	Description of site
<b>Source:</b>	South Hams District Council Planning Register
<b>Date downloaded:</b>	21st October 2024

## PLANNING APPLICATION REPORT

Case Officer: Charlotte Howrihane

Parish: Staverton Ward: Dartington & Staverton

Application No: 2104/23/FUL

**Agent:**

Mr Christopher Stacey  
Christopher Stacey Architecture  
Venn Meadow Barn  
Venn Cross  
Denbury, Newton Abbot  
TQ12 6EJ

**Applicant:**

Veale  
Champernowne  
Dartington  
Totnes  
TQ9 6JN

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

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

**Recommendation:** Conditional approval

**Conditions:**

1. Standard time limit
2. Accord with plans
3. Removal of PD rights
4. Unsuspected contamination
5. Details of materials to be provided
6. Timber boarding
7. Boundary wall to be of natural matching stone
8. Accord with drainage details
9. Accord with recommendations of ecology report, confirmation to be provided
10. No works to be undertaken during bird nesting season
11. Domestic garden area to be contained within red line, and not blue line
12. Details of external lighting
13. Solar panels to be installed prior to occupation of dwellings
14. EV charging points
15. Parking to be provided prior to the occupation of dwellings and retained

**Key issues for consideration:**

Principle of development, design, landscape impact, highways/parking, low carbon development, drainage, ecology

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**Site Description:**

The application site is currently two barns which has previously been used to house livestock and store hay/straw. The buildings are masonry, steel, and timber frame construction. The main access to the barns is from the north-east and south-east. Although the site has a rural character, it is on the surrounded by other clusters of built form with a mix of agricultural and residential character. The site is not within any special areas of designation.

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<b>Planning Application:</b>	2104/23/FUL
<b>Document name:</b>	Officer Report
<b>Document file:</b>	9121985.pdf
<b>Page:</b>	1 of 7
<b>Highlighted text:</b>	Planning decision
<b>Source:</b>	South Hams District Council Planning Register
<b>Date downloaded:</b>	21st October 2024



**Planning Application:** 2104/23/FUL

**Document name:** \*3288.08.B- Proposed Floor Plans (Unit 1)

**Document file:** 9062584.pdf

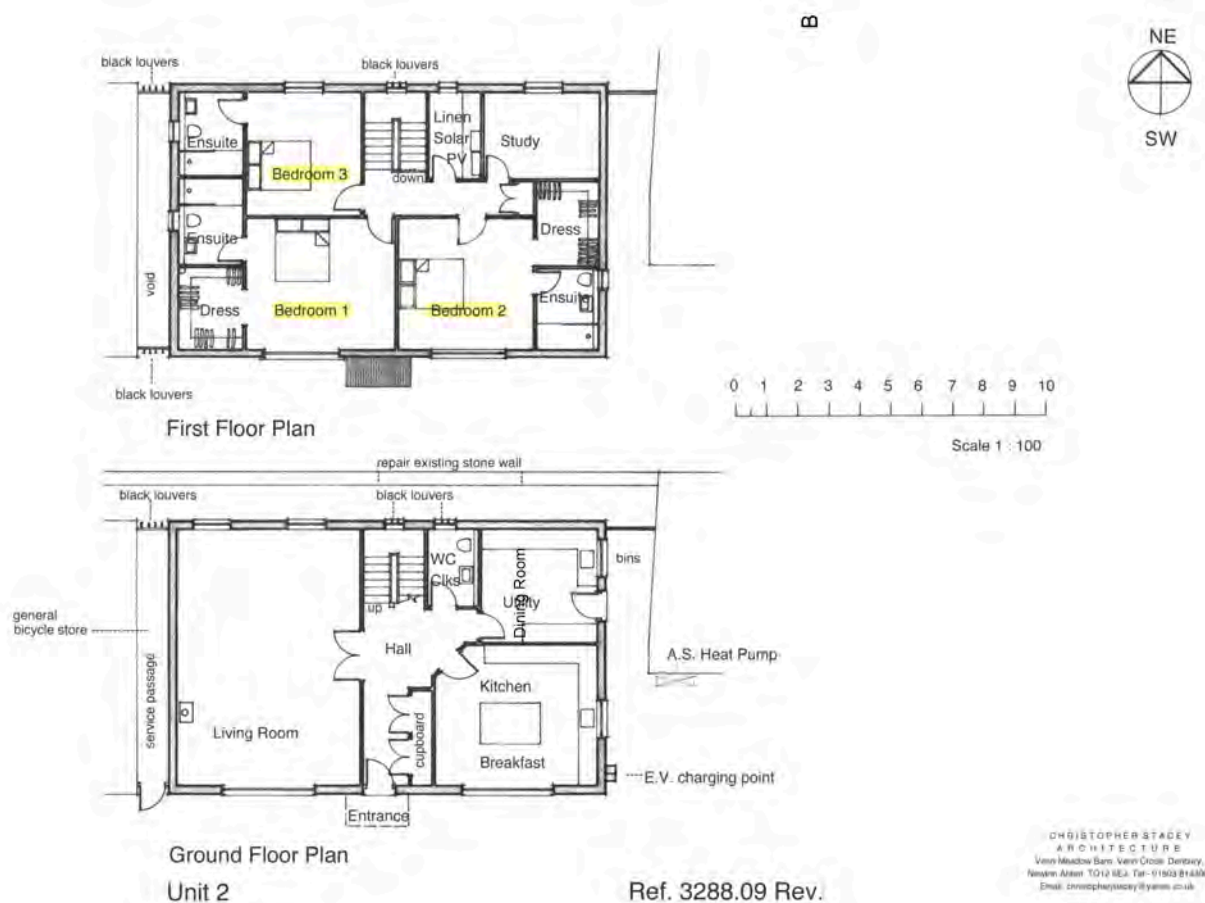
**Page:** 1 of 1

**Highlighted text:** Unit 1 Bedrooms

**Source:** South Hams District Council Planning Register

**Date downloaded:** 21st October 2024





**Planning Application:** 2104/23/FUL

**Document name:** \*3288.09.B- Proposed Floor Plans (Unit 2)

**Document file:** 9062585.pdf

**Page:** 1 of 1

**Highlighted text:** Unit 2 Bedrooms

**Source:** South Hams District Council Planning Register

**Date downloaded:** 21st October 2024

Parking space	Dimension
Parking bay in front of a garage	2.5m x 5.5m
Parking bay for persons with disabilities	3.8m x 5.0m
Domestic garage (internal dimensions)	6.5m x 3.5m
<i>Additional width will be required where adjacent to a structure or where there is a shared pedestrian entrance.</i>	

**Table 29 Parking dimensions**

### DEV29.3 – Parking provision: residential

**8.6** Car parking standards for new residential development are important to avoid adverse impacts of inadequate parking such as excessive on-street parking or illegal parking and to protect the amenity of surrounding residential areas and ensure safety of the highway network.

**8.7** The below table shows indicative car parking provision to be provided within any new residential development, including residential conversions. Any application that proposes a lower or higher level of parking will be required to provide evidence to justify this proposal. Evidence may be presented on the grounds of the impact to the function of the highway, the location within the Plan Area (for example, in rural areas, additional parking may be necessary as well as additional parking for visitors) future programmed infrastructure improvements, and/or availability or restrictions in the surrounding area.

Type/size of development	Indicative parking provision
1 bedroom dwellings	1 space per dwelling
2 bedroom dwellings	2 spaces per dwelling
3 bedroom dwellings	2 spaces per dwelling
4 bedroom dwellings	3 spaces per dwelling
HMOs	1 space per 2 bed spaces
Purpose-built student accommodation (PBSA)	The number of spaces will be looked at on a case-by-case basis and based on location and presence of a CPZ. A suitable number of spaces for the purposes of drop-off should be provided.

**Table 30 Indicative car parking provision for new residential development**

**8.8** In the South Hams and West Devon LPA areas, a higher number of parking spaces may be necessary due to greater reliance of residents and visitors on private cars. It will need to be demonstrated that sufficient parking is provided and that the number of spaces, their location, layout and design will not have adverse impacts with respect to highway safety, amenity and character.

**Document file:** JLPSPD2020FINALred.pdf  
**Document title:** PSWD JLP Supplementary Planning Document  
**Document author:** Plymouth City Council  
**Date created:** 2020-06-09  
**Date modified:** 2021-08-20  
**Policy:** DEV29.3 Parking provision: residential  
**Page:** 156 of 308  
**Highlighted text:** Parking provision for 3-bedroom dwellings  
**Source:** South Hams District Council Planning Policies  
**Date downloaded:** 21st October 2024

**9. Materials**  
If applicable, please state what materials are to be used externally. Include type, colour and name for each material:

	Existing (where applicable)	Proposed	Not applicable	Don't Know
Walls		WHITE STUCCO RENDER / GREY BOARDING.	<input type="checkbox"/>	<input type="checkbox"/>
Roof		LUGO GREY SLATE	<input type="checkbox"/>	<input type="checkbox"/>
Windows		GREY POWDER COATED ALUMINIUM	<input type="checkbox"/>	<input type="checkbox"/>
Doors		GREY ROUER + TIMBER	<input type="checkbox"/>	<input type="checkbox"/>
Boundary treatments (e.g. fences, walls)			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Vehicle access and hard-standing		FREE DRAINING GRAVEL	<input type="checkbox"/>	<input type="checkbox"/>
Lighting			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Others (please specify)			<input checked="" type="checkbox"/>	<input type="checkbox"/>

Are you supplying additional information on submitted plan(s)/drawing(s)/design and access statement? ☒ Yes ☐ No

If Yes, please state references for the plan(s)/drawing(s)/design and access statement:

DRAWING NO : 3288/18 SITE LAYOUT.  
3288/19 DOUBLE GARAGE.  
3288/20 DOUBLE GARAGE.  
SITE PLAN.  
DESIGN + ACCESS STATEMENT.

**10. Vehicle Parking**  
Please provide information on the existing and proposed number of on-site parking spaces:

Type of Vehicle	Total Existing	Total proposed (including spaces retained)	Difference in spaces
Cars	4	7	3
Light goods vehicles/ public carrier vehicles			
Motorcycles			
Disability spaces			
Cycle spaces			
Other (e.g. Bus)			
Other (e.g. Bus)			

ECAR 2024

**Planning Application:** 2031/24/FUL  
**Document name:** Application form  
**Document file:** App.pdf  
**Document section:** 10. Vehicle Parking  
**Page:** 4 of 11  
**Highlighted text:** Existing and proposed vehicle parking  
**Source:** South Hams District Council Planning Register  
**Date downloaded:** 21st October 2024



## 9. Promoting sustainable transport

108. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- a) the potential impacts of development on transport networks can be addressed;
  - b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
  - c) opportunities to promote walking, cycling and public transport use are identified and pursued;
  - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
  - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
109. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
110. Planning policies should:
- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
  - b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
  - c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
  - d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

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<b>Document file:</b>	NPPF_December_2023.pdf
<b>Document title:</b>	National Planning Policy Framework
<b>Issued by:</b>	Ministry of Housing, Communities & Local Government
<b>Date created:</b>	2023-12-19
<b>Date modified:</b>	2024-07-19
<b>Section:</b>	9. Promoting sustainable transport
<b>Paragraph:</b>	108
<b>Page:</b>	31 of 78
<b>Source:</b>	Google search
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**Policy DEV29****Specific provisions relating to transport**

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.



<b>Document file:</b>	Plymouth and South West Devon Joint Local Plan (March 2019).pdf
<b>Document title:</b>	Plymouth and South West Devon Joint Local Plan
<b>Produced by:</b>	West Devon Borough Council, South Hams District Council and Plymouth City Council
<b>Date created:</b>	2019-03-19
<b>Date modified:</b>	2021-08-20
<b>Policy:</b>	DEV29
<b>Title:</b>	Specific provisions relating to transport
<b>Page:</b>	289 of 368
<b>Source:</b>	South Hams District Council Planning Policies
<b>Date downloaded:</b>	21st October 2024



## 2023 UK greenhouse gas emissions, provisional figures

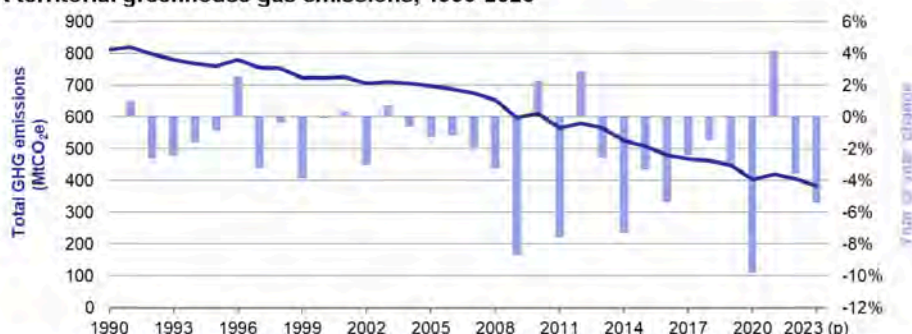
28 March 2024

Accredited Official Statistics

In 2023, net territorial greenhouse gas emissions in the UK are provisionally estimated to have been 384.2 million tonnes of carbon dioxide equivalent (MtCO<sub>2</sub>e), a decrease of 5.4% from the 2022 figure of 406.2 MtCO<sub>2</sub>e. Carbon dioxide (CO<sub>2</sub>) emissions decreased by 6.6%, to 302.8 million tonnes (Mt). Total greenhouse gas emissions were 52.7% lower than they were in 1990.

- This decrease in 2023 is primarily due to a reduction in gas demand from the electricity supply and buildings and product uses sectors. Greenhouse gas emissions from electricity supply fell 10.8 MtCO<sub>2</sub>e (19.6%) in 2023, primarily due to higher electricity imports from France, unlike 2022 when the UK had higher than usual exports, as well as UK electricity demand continuing to decline. This meant less gas was needed to meet the remaining electricity demand. Meanwhile, emissions from buildings and products uses fell 5.1 MtCO<sub>2</sub>e (6.2%), with high energy prices likely to have been a factor in reduced gas use for heating buildings.
- Industry sector emissions fell 4.6 MtCO<sub>2</sub>e (8.0%), largely due to reduced fuel consumption in the iron and steel industry. There was also a 1.6 MtCO<sub>2</sub>e (1.4%) fall in greenhouse gas emissions from domestic transport. Compared to 2019, the most recent pre-pandemic year, domestic transport emissions are down 11.1%. Domestic transport remains the largest source of emissions in the UK, accounting for 29.1% in 2023.

### UK territorial greenhouse gas emissions, 1990-2023



#### What you need to know about these statistics:

This publication provides provisional estimates of 2023 UK territorial greenhouse gas emissions, meaning emissions that occur within the UK's borders. Emissions are presented in million tonne carbon dioxide equivalent units (MtCO<sub>2</sub>e) throughout this statistical release.

These estimates give an early indication of emissions in 2023 and are subject to revision when final estimates are published in February 2025. They also include estimates of quarterly emissions and the impact on emissions of external temperature changes.

Responsible statistician: William Hayes      Email: [GreenhouseGas.Statistics@energysecurity.gov.uk](mailto:GreenhouseGas.Statistics@energysecurity.gov.uk)  
 Media enquiries: 020 7215 1000      Public enquiries: 07385 931259      Next publication: March 2025

Document file:	uk-greenhouse-gas-emissions-provisional-figures-statistical-release-2023.pdf
Document title:	2023 UK greenhouse gas emissions, provisional figures
Document author:	Department for Energy Security and Net Zero
Date created and modified:	2024-03-27
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Date downloaded:	21st October 2024