

17th April 2020

Dear South Hams Council,

This letter is a response to two planning applications at Woolwell, 4181/19/OPA and 4185/19/OPA, and should be registered as an **objection** to each of them. All references are to the Design and Access Statement for 4185/19/OPA, but the principles apply to both.



Transition Tavistock is a community group promoting sustainability in Tavistock and the surrounding area. We are responding to this application as it has serious implications for some of our aims, which include promoting sustainable transport in our area, and supporting a Devon wide response to the Climate Emergency.

We regret that these applications show only token attention to climate change. Section 2.6 of the Design and Access Statement acknowledges the relevant principles, but commitment to following them appears weak. For example optimising building orientation for passive solar gain is noted as something that “may be incorporated as design develops”. The appraisal of existing buildings in the area acknowledges the high standard of the Eco Village, but there appears to be no intention to offer buildings of this standard in any part of the new development. The fact that none of the many homes shown as illustrations of potential style in Chapter 4 have solar panels speaks for itself.

The main focus of our objection is the inadequacy of transport planning, despite the applicant’s claim that the development will be well served by public transport, walking and cycling. Key points are that:

- While the proposed priority for walking and cycling is better served here than in some recent new developments, aspects of the design will still push residents into choosing to drive even for local trips. See Note 1 below.
- The provision for cycling within the proposed estates will be of limited use unless there is proper connectivity to the rest of Plymouth and to Yelverton and beyond to the north. The application gives a misleading impression on this, in particular through repeatedly citing the nearness of NCN27 while showing no means of reaching it. See Note 2 below.
- Assurances of good public transport links are given. However this is proposed through a measure which will adversely affect bus users from Tavistock, and so lead to increased car journeys on the full length of the A386 from Tavistock to central Plymouth. This impact is not considered at all in the transport assessment. See Note 3 below.

While **we welcome the applicant’s stated aim to provide “a network of open spaces and landscape areas** including new woodland, wetland habitats and wildflower meadows”, we note that a number of people more familiar with these sites than we are have raised objections due to the of impact on wildlife and the environment.

Note 1: Connectivity within the sites

We consider that the Design and Access statement makes exaggerated claims about this. For example, Figure 11 (p25) shows an 800m circle and describes this as “about 10 minutes walk”. 800m in a straight line is 3mph – a brisk rather than typical walking pace, and of course any route from centre to boundary would be significantly longer in practice.

The site layout is still designed to suit cars as the principal mode of transport. For example, Figure 25 (p48) shows a leisure route through green space which might work well for runners but appears to have very few connection points to residential streets. (Figure 55 inadvertently shows this graphically.) The old tramway is suggested as a walking / cycling spine, but drawings do not show connections to it from housing. There appear to be few if any pedestrian / cycle cut throughs between adjacent road loops, so people who might live in houses only 200m apart could have to walk 3 times that distance to visit each other.

We do support the master plan parameters for access and movement, including the widths (p64), designing out inappropriate car parking, and provision of secure covered cycle parking. We are, however, very surprised that there is no mention at all of electric vehicle charging, which should be provided from the start both for homes and public car parks. We would like to see more detail of what “high quality, safe and accessible” means for the tramway route. This should include an all weather surface, wide step free access points and sufficient lighting.

Note 2: Connectivity by walking and cycling beyond the site.

The cycling infrastructure in Plymouth and the nearby parts of Devon are inadequate to support the degree of cycle use envisaged in the transport assessment, and this is not acknowledged.

The nearness of NCN27 is cited several times, but there is no plan set out for achieving a link from this to the site, nor acknowledgement that such a link would involve a steep gradient, or that the route is designed and used mainly for leisure, not commuting, and is not lit at night.

We are pleased that the applicant recognises the importance of residents being able to reach employment sites by walking or cycling. However, the Design and Access Statement claims on this are overstated, because it shows direct distances rather than achievable safe routes.

The application acknowledges that “improvements” to cycle infrastructure between Roborough and the George Junction are needed – an understatement as this is currently impossible except at high risk. However other objectors have pointed out that that this needs to be in place before any additional houses are built.

The need for a commuter standard cycle route between Yelverton and Roborough is well established, and the addition of a development of this size, with the intended cycling culture, would significantly add to that need. However, there is no mention of this in the application. The numerous calls on S106 funds arising from this development which other respondents have justifiably made mean that it seems highly unlikely that the applicant will contribute to the cycle route.

Note 3: Bus provision

While we are pleased that the applicant has designed in bus access, the assessment of the impact this will have on overall traffic is deeply flawed by the lack of consideration of the impact on other places on the relevant bus routes. We were shocked to read that agreement in principle has been reached with Stagecoach to divert Route 1 (Tavistock – Plymouth), with no consultation with current users of that route. We presume users of the Plymouth based routes also cited may face some detriment as well.

The May 2019 timetable for route 1 shows a journey time (Tavistock bus station to Royal Parade) of 59 minutes from 9am on, but 70 minutes earlier in the morning. Regular users will attest that these times can be exceeded in heavy traffic. Any extension to this time would tip the timetabled journey to be over an hour even in good conditions – a significant psychological deterrent to use. The

technical note from Peter Brett Associates which forms part of the application predicts 6 minutes additional time on average based just on the distance. If (as intended) significant use of the service is made by residents, or there is congestion at the exit from the estate, journey times would be even longer and less predictable.

The effect would be that “planning time” for travellers from Tavistock needing assurance of their arrival time would become 90 minutes even for those living reasonably close to a stop. This is likely to push many bus users back to cars if they have them, and increase inequality of access for those who have not. It will fatally undermine work we as volunteers, the bus industry, and councils through their climate emergency plans, have been doing to encourage car users to try public transport. With significant housing development already agreed for Tavistock, this will all load the A386 into Plymouth with cars. Buses will be caught in the congestion, so services will become more unreliable – unattractive to users at all points on the route, including Woolwell – resulting in a spiral into polluting traffic chaos. **We object strongly to this underhand proposal, and would expect South Hams Council, which works closely with West Devon, to take account of this broader picture and demand a realistic alternative proposal for buses which leads to improvement rather than deterioration in options for sustainable travel between Tavistock / Yelverton and Plymouth.**

Confidence in the research done on public transport options is also undermined by the fact that the Design and Access statement is out of date (compared to the published May 2019 timetables) in some important details about bus provision, and exaggerates the quality of current provision. For example on p18 it lists CityBus service 46 as a route to Tavistock. This no longer runs. The table shows that this leaves only one hourly bus in any direction on Sundays and evenings, yet the text above says public transport is “very good”. School buses to Devonport are mentioned, but the Peter Brett note confirms that there is no spare capacity on these.