

THE PROPOSED BEACH DEVELOPMENT, TRAFFIC & RELATED ISSUES

Key Issues:

- Introduction - Traffic Planning History of Site
- Congested Arterial Road Network
- Site Access Route Eastward
- Site Access Route Westward
- The Construction Phase
- Green Travel
- Car Parking
- Planning Policy Guidance, Traffic.
- Future Traffic Growth, Road Transport Forecasts, 2009 onward.

1. Introduction:

1.1 The generation of increased traffic movement has been a constant and key issue for the many developers who have brought forward proposals for development upon the beaches at Carlyon Bay.

1.2 As long ago as **1952**, yes, nearly sixty years ago, the (then) Cornwall County Council **rejected** plans for the placing of only 20 residential caravans upon Carlyon Bay beaches, mainly upon grounds of increased traffic but also for environmental and amenity reasons. That almost ancient decision was upheld when an Appeal was dismissed on 30th. November 1953 by the Ministry of Housing & Local Government. On the 11th.June 1973 the County Council again **rejected** an Application for development on this beach. One of the main reasons given for refusal was traffic and access. This same concern is later reflected in the St.Austell District Plan of **1982** – where, under Section 15.8.9, is the statement that “**access does cause concern**”...

- 1.3 Since then, numerous alternative proposals have been put forward, among them the somewhat star-crossed **1989** proposal, details of which will be found elsewhere in these submissions made on behalf of Carlyonbaywatch. County Hall, Truro had spent tens of thousands of pounds in resisting this developer at a 2006 public inquiry which, after four long and intensive weeks of examination, found against a retrospective Application for the sea defences built along the shoreline in 2004. Traffic issues have been a common theme throughout, and at the moment of writing, despite the so-called green travel plan, the local community are still presented with a truly massive problem. The developer's repeated refrain that traffic-movement increase will be "negligible" is an insult to the intelligence of the local community, and defies experience.
- 1.4 **The community, and the Local Authority which should protect the community's interests, is faced here with a carefully-crafted conundrum, wrapped up in the word 'Hybrid'.** We have already seen a deliberately separate Planning Application made for the top car park (**PA10/07544**) and now we have a **Detailed** Application for the proposed Sea Wall but, importantly, only **Outline** Consent is sought for the 30-plus acres, much of which is "Greenfield", behind it.
- 1.5 We, the public, through our elected representatives, are asked to approve what is, in planning terms, a pig in a poke. A truly massive **655,000 sq ft** of permanent residential space, coupled with **105,000 sq ft** of commercial space, equal in size to two Asda Stores, and **840 car-parking spaces**, all in "outline" only.
- 1.6 The residential space, allocated to 511 dwellings, would average circa 1,250 sq.ft per dwelling and, if average room sizes were (say) 200 sq.ft., this would mean an average of at least six rooms per dwelling. Yes, averages can be deceptive but within the further evidence of 840 car spaces, about one third of the luxury apartments will have two garage-spaces each. This indicates there will be lots of two-car families, but the main problem is that it's all sought to be in "**outline**", which renders all of the traffic projections to be, at best, speculative. It is against this ethereal background that the whole of this Application, and the related Application for the top car park, should be judged, especially in the consideration of traffic issues. **If we do not know the final design, or the nature of final occupancy, we cannot, indeed**

must not, rely upon traffic projections presented to 'assist' the Planning Authority.

2. Congested Arterial Road Network

2.1 By way of introduction to this section, readers are asked to study the bird's-eye view below of the Carlyon Bay settlement, where it will be seen at a glance that the traffic serving any and all development on the **south** side of the A390 running between Charlestown and Par has absolutely no choice. It **must** use the A390.



2.2 Highways proposals are presently before the County Council to reduce the existing 40mph speed limit along the **A390** to 30mph., with the intention being to further slow the peak-hours traffic, thus creating even longer traffic queues than are presently experienced, both east-bound and westbound.

2.3 The **A390** is a direct link to the **A38**, whilst the **A391** is a direct link to the **A30**, the two main arterial routes into Cornwall, not only for tourist traffic but also for the commercial traffic that is vital to our economy.

2.4 Local people are only too well aware of the chronic traffic bottlenecks on the **A391**, at Bugle, Stenalees, Carluddon and Penwithick. Their lives are already **sorely blighted** by the increasing amount of traffic passing, day and night, summer and winter, through what are their main residential streets, and proposals to further choke this route without proper new infrastructure is simply adding to this intolerable blight. How many Planning Officers, how many Councillors, actually live alongside these routes ? And how would they feel about this if they did ?

2.5 The traffic survey undertaken in 2003 on behalf of the developer by Messrs. Colin Buchanan Partners of Bristol agreed and confirmed that traffic using the 'Holmbush Corridor' [which is that length of the A390 which connects the Britannia Inn, Par Moor with the Penrice Roundabout, Charlestown] is already at "**saturation level**", with an annual movement of some 9,000,000 vehicles, whilst the additional traffic generation for the so called "Extant" 1989/90 Planning Consent of 511 apartments and associated facilities was stated to be an additional circa 1,500,000 movements per annum. In other words, the development would impose an additional 16% volume of traffic upon an already saturated road network.

2.6 The aerial-view 1995 map above also shows (hatched blue) that the existing settlement at Carlyon Bay, bounded to its north by the main railway line and comprising circa 600 dwellings, was already almost completely full. The fact is that, since the picture was taken, developers have increased the congestion by further housing development at Wheel Regent, the formerly wooded area of Carlyon Bay, and by demolition of existing dwellings to rebuild with increased density. This process has now used up virtually every inch of development space. It follows, almost at a glance, that the proposal to add a further 511 dwellings to be built upon the immediately adjacent beaches can be seen as wholly disproportionate.

2.7 Crinnis-Shorthorn-Polgaver is now the only beach of any size directly serving the population of St.Austell, and it is not reasonably disputed that, after completion of the proposed beach project, the resultant vehicular access by new 'residents' combined with the traffic generated by day-trippers and local members of the public will create an additional average of 4,000 movements every day to and from the beach.

2.8 Upon the 'business plan' information for the completed development presently available such as the number of residents or residents' visitors, the number of people using facilities such as bars and/or restaurants, the size of the workforce and the number of other 'day trippers' accessing the beach (as was experienced pre-2004) it is fair to state that the on-site public car parking facility is grossly inadequate. Whilst the

four-year construction phase would itself seriously add to the traffic problem, there will be an ongoing additional volume of commercial vehicles for maintenance and supply.

2.9 Similarly, these traffic-movement calculations pose a very serious problem for the Carlyon Bay settlement both now and for the future. There are only two routes available for access to Carlyon Bay, the one running westward along Beach Road, Crinnis Road and Church Road, and the other running north-eastward out of Sea Road North and Cypress Avenue. As earlier stated, to suggest the increase will be “negligible” is an insult to the intelligence of the local community, and defies experience.

3. Site Access Route Eastward

3.1 Taking first the eastward route, being Sea Road North and Cypress Avenue to and from Par Moor Road **A3082** connecting with the **A390**, the Sea Road North section of this route is privately owned. A report recently commissioned by Cornwall Council has demonstrated that this section of road is certainly not up to the standard required for traffic of such intensity. Worse, the Council’s estimate for bringing it to adoption standard is nearly half a million pounds (plus VAT). Even if it was fair to suggest that the householders owning that section of road should pay up simply to help the developer company to achieve its ambitions, it is highly unlikely that they would be in any position to meet such huge costs.

3.2 The eastward route also includes the unique Gothic-style railway arch designed by Isombard K Brunel and opened in 1859, which is now a Grade II listed structure which, apart from its essential function and despite its special character, would be under severe threat from the additional traffic which must result from the proposed development.



This Grade II Listed arch (by I.K.Brunel) was damaged again last year.

3.3 Traffic using the eastward route must of course use Par Moor Road A3082 which itself is already highly congested on Par Market Days, and this route is again the main link to the A390 for the proposed new Par Harbour Marina and Dockside Apartments. Further eastward, Fowey also relies heavily upon its A390 link. All of these proposed new developments, together with the new eco-town traffic demands, will ensure gridlock, with the resultant economic impact upon the area.

4. Site Access Route Westward

4.1 The westward route is, from a safety viewpoint, even more problematic. The already congested routes to and from Charlestown Primary and Penrice Secondary schools are regularly reduced to 'single lane' (i.e. one-way) at start and close of school and, with both weddings and funerals at St. Paul's Church, Church Road often becomes virtually impassable. The underlying nature of Beach Road is hazardous, traversing as it does at least a dozen mining stopes, some wide, some deep, some both wide and deep. There will be some stopes that are un-recorded, because it was not until 1850 that there was a statutory requirement that they be recorded. No testing has yet been done to establish the stability of this road for the bearing of a substantial number of heavy loads.

4.2 Beach Road is such that it already requires frequent maintenance and is, by urban standards, of sub-standard design and construction. It is maintainable at the cost of the public, which faces the risk of costly and serious damage if the development should proceed. Whilst the developer suggests putting right the damage caused during

construction, a permanent doubling of the traffic load means that future repairs must continue to be funded publicly.

4.3 To suggest that either of these two routes is capable of absorbing an additional average daily movement of anything like 4,000 vehicles per day is, frankly, ridiculous.

4.4 Almost as ridiculous, we believe, as the way in which, as if by magic, average daily movements forecast at 5,000 for the development in 2006 have now been cut in half, even though **final year-around occupancy** is yet to be determined. The danger with 'averages' is of course that they are made up of peaks and troughs, so that during the peak hours, these narrow roads propose a serious threat to schoolchildren and local residents alike.

4.5 Even **without** the proposed new development, the roadsides adjacent to the crossroads of Beach Road/Sea Road are already regularly jammed with parked cars through almost the entire year. Carlyon Bay Hotel & Golf Course is, more often than not, overflowing with parked vehicles, and people already deliberately park vehicles on these roads because they have been unable to park them on the beach, or have chosen not to pay when charges were levied.

4.6 As stated earlier, the planned provision for beach public parking is grossly inadequate and this massive traffic nuisance will become, in perpetuity, a blight upon generations of local people yet unborn. These are the reasons why Cornwall County Council and local residents have consistently opposed any large-scale development and, equally consistently, they have almost unanimously supported the creation of a landmark scheme for this beach site on a lesser scale, restricted to the brownfield Coliseum section on Crinnis.

4.7 Further in this section, on the grounds of both **consistency and fairness**, it is important to note that both the County Council and the Planning Inspectorate very recently rejected an Application by Kentucky Fried Chicken for an outlet on the **A390** at Holmbush, each accepting the concern about traffic congestion. On this subject of fairness, two years ago, the Application by Par Moor Market for additional market days was similarly rejected, at great public cost, even to the High Court in London. **There can be no reasonable doubt that traffic congestion and saturation of the A390 was again seen as a primary problem and the main ground for its rejection by the Authorities**, including the High Court. This same congested route must serve any development on the Carlyon Bay beaches. **For consistency and fairness, and as sauce for the goose...**

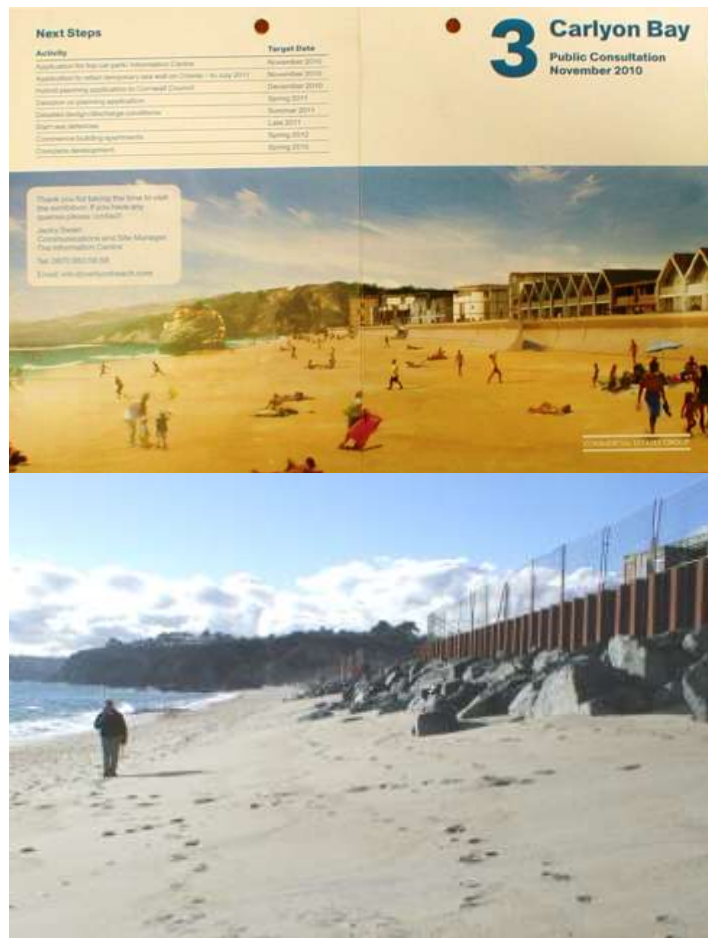


The A390 at Holmbush, any day

4.8 Sadly, the stretch of the A390 running between the Bucklers Lane junction and the Penrice Roundabout is already the most highly traffic-polluted stretch of road in the town and probably in the County. **Levels of carbon monoxide and carbon dioxide are already above acceptable limits, and worse is already to come with the doubling of the Tesco site in the near future, so that any traffic increase that can be avoided (such as the Carlyon Bay development traffic) must be avoided.**

5. The Construction Phase

5.1 **We have established that it will not be possible to build and afterward to maintain the 2011 design without a very substantial initial recharge and afterward continuing replenishment of the beach. The evidence on site is not only readily apparent, even to the casual observer, but is also proven by the acknowledged highly mobile nature of the beach material.** Any visitor to the beach will immediately see that there is a vast difference between the reality and the imaginary outcome, which would require well over a million tonnes of 'new' sand (or stent) to accomplish, bearing in mind that **the finished height of the existing shuttering marks only the 'toe' of the concrete recurve wall.** This requirement alone would generate well over **100,000 h.g.v. return journeys** for delivery, but the Environmental Statement appears less than helpful in showing how this might be achieved. Every picture tells a story, but perhaps two pictures tell it even better...



5.2 For this reason, we believe that the EIA contains serious weaknesses appertaining to the developer's construction traffic forecasts. In particular, we submit that the numbers of lorry movements necessary for initial construction, and then for continuous maintenance requirements, are also **seriously understated**. A detailed study of the EA shows that no allowance has been made for the inevitable loss of substantial amounts of material due to tidal and/or storm events occurring both during the initial construction phase and after completion. Additionally, the construction requirements for steel, cement, aggregate and other infill materials, together with the heavy construction equipment necessary to bring the proposed new Sea Wall 9.2m above OS datum at completion would almost certainly bring the transportation tonnage figure well beyond those quoted in the EA.

5.3 Our conclusion is that delivery of these vast quantities of materials and equipment over a four year period will place an intolerable burden upon the local populace, and will make access to the Primary School increasingly dangerous. Whilst it is envisaged that there will notionally be an embargo on LGV traffic at

each end of the school day, past experience has shown that this embargo has not been properly observed.

- 5.4 Whilst attending the so-called 'liaison meetings' we have frequently been told that there will be '**holding compounds**' for construction traffic and materials, but there is nothing presently indicated in the EA to suggest how this will be provided.
- 5.5 We further utterly refute the repeated use on behalf of the developer within the EA of words such as "**small**" and "**negligible**" when reporting on potential traffic-movement generation both during construction and after completion. These adjectives are nothing less than "**weasel words**", we say deliberately applied in an effort to persuade the reader that this huge development is merely just about 'traffic-neutral'. Just exactly whom do they think they are trying to kid ?

6. **Green Travel**

- 6.1 Much has been claimed for the so called "green-ness" of electric cars but, whilst they do have an advantage of reducing pollution at street-level, the amount of pollution which is caused in using fossil-fuels to generate the required vast amount of electricity, not to mention the heavy toxicity of the car-battery systems, has yet to be fully quantified.
- 6.2 Even if, eventually, all electricity were to be generated by nuclear power, nobody can seriously argue that the resultant very long-term harm from nuclear waste for future generations unborn could ever be justified by the demand for mobility (expected as of right) by the current population of the developed world. Significantly, few people presently think of the fact that, in winter, electric cars need internal heating, only available by draining their batteries of electric power, over 90% generated by fossil fuels.
- 6.3 The developer claims that its provision for electric vehicles is a major element in its green travel plan, but fails to address the long-term harm that must inevitably result from an increased demand for electricity. It is noteworthy that this Application (with undercroft parking for 840 vehicles serving 500 apartments) is clearly intended for substantial occupation by **two-car** families. As green-ness goes, that sounds very grey indeed and, in any event, this does nothing to restrict traffic-volumes.

- 6.4** As to bus services, it is proposed by the developer that *"it shall operate, fund or procure operation of a bus service for a period of not less than three years"*, but the developer is silent about what happens after three years... are we then back to the dear old public purse ?
- 6.5** The impact of the development upon public rights of way, and public access to over a mile of shoreline has already been severe, and threatens to worsen by the crowding-out of users of these amenities. **The land between median high water and median low water** is held in trust by the Duchy of Cornwall for the people, and access to this land has already been severely and unlawfully restricted by this developer, who has deliberately acted outside the Planning law, and who has consistently failed to comply with an Enforcement Notice.
- 6.5** As to green travel, Cornwall's most important public right of way (the South West Coast Path No.36) has already been illegally blocked and/or re-routed by the developer, and the recent addition to the definitive map of the route down to the foreshore has deliberately been obstructed. The evidence is plain for anyone to see, because the massive unauthorised steel shuttering and rock-armour completely bisects the route to the shoreline. In a show of faux-magnanimity, the developer constructed a stepway over the illicit obstruction, but still unlawfully closes access to the beach via this route every night even though it is potentially an escape-route to beach-combers caught by tides.
- 6.6** Probably the most telling aspect against the validity of the so-called green travel plan is spelt out more fully in the section on **Planning Policy Guidance No. 13** below, but suffice it to state here that, by any modest extrapolation of the known facts, the proposed development will generate in the order of **16.5 million miles** of traffic movement annually.
- 6.7** These so-called 'green travel' proposals fail to take into account the high degree of dependence by local people upon their cars for commuting and shopping purposes, so that, with the planned intention of constructing 511 luxury residential properties, each with an **average** floor space equal to seven rooms, each with its own undercroft parking space (many for two cars each) the amount of localised traffic will **double**, even before taking into account the traffic generated by thousands of day visitors and service vehicles to and from the beach.

- 6.8 Local authorities are required under **Part IV of the Environment Act 1995** to review and assess **air quality** in their areas, and to designate air quality management areas and **draw up action plans** where national policies and instruments alone appear unlikely to deliver the Government's health-based **national air quality objectives**.
- 6.9 It would appear that, presently, no-one has given this air-quality issue the level of attention that is essential to ensure that local residents (**particularly those living along Beach Road and/or attending the primary school**) are not adversely affected by the huge increase in traffic which must result from this development. If traffic volumes increase with the intensity that must result from this development, no amount of mitigation measures can hope to overcome the pollution of exhaust fumes that must result. Further, the residential roads of Carlyon Bay were never constructed to bear the huge impact of either the heavy construction traffic or the subsequent permanent doubling of traffic-movement levels.
- 6.10 The developer now proposes that average daily traffic movements will be contained at 2,500 per day, this having been halved, as if by magic, from the 5,000 per day figure canvassed at the 2006 public inquiry. Even if the developer were correct in its assertion, it is averred that the developer's most recent claim that "**Residents are unlikely to notice this increase in traffic**" is downright insulting to their intelligence and, frankly, risible.
- 6.11 Whilst considering 'green issues', it should be carefully noted that (in the words of **PPG13**) **unacceptable development should never be permitted because of the existence of a travel plan (green or otherwise)**. The very obviously increased danger to pedestrians, particularly to young school-children, makes this Application unacceptable.
- 6.12 It is increasingly recognised that socio-economic problems, including the problem of traffic growth, derive from the fact that Cornwall is still far too dependent upon 'tourism' with its seasonal workforce, anti-social hours and minimal wage-rates. The developer submits (*Volume 2 Main Technical Studies, Chapter F Socio Economics F4.45*) that Cornwall has over 40 commercial visitor attractions where an admission fee is charged.

6.13 The 'top ten' attractions in terms of the number of visitors in 2006 are set out in their Table F4.1 reproduced below.

TOP TEN Attractions	Total Visitors
Eden Project, St Austell	1,152,300
St Michael's Mount	196,300
Newquay Zoo, Newquay	191,800
Tintagel Castle	183,500
The Minack Theatre and visitor centre	175,400
Truro Cathedral, Truro	140,000
Cotehele House	120,800
Trelissick Garden	118,000
Trebah Garden	106,300
Royal Cornwall Museum / National Maritime Museum	103,500

6.14 As to accessibility, **none** of these "Top 10 Visitor Attractions" are within reasonable walking or cycling distance from the proposed development and, with very infrequent and ill-matched bus connections, one cannot reasonably expect to achieve a meaningful contribution to Cornwall's economy whilst relying upon the Carlyon Bay visitors to use sustainable transport to access them.

6.15 The developer wrongly claims in the EA 7.5.6. that "the application site is well connected to all these areas by a good network of footways and footpaths that are well lit". The truth is that **none** of the key stretch of the South West Coast Path No. 36 traversing this area is "well lit". Indeed it is completely **unlit**, except at the circuit of Charlestown Harbour.

6.16 These facts notwithstanding, the developer self-contradictorily submits Travel Plan Measures which state, at Appendix G1 Transport Assessment, section 8.3 : **"For the proposed development at Carlyon Bay, the Travel Plan will seek to maximise use of more sustainable modes (including public transport, cycling and walking) as opposed to car based travel".**

6.17 Here again, the fact is that anyone who has visited the attractions listed, or others such as the Flambards Helston Park, the Crealy Adventure Park, even the

single annual events such as Royal Cornwall Show, Culdrose Air Day, Helston Flora and Padstow 'Obby Oss Day, **will know for certain** that cars were absolutely essential to the success of these events.

- 6.18 That is the real Cornwall – known to us from long experience, not through some carefully crafted traffic movement surveys which are remarkable only for their selectivity and their incomparability with the project at hand. Probably one of the most misleading sections of the traffic-related submissions made in support of its Application by the developer is the comparator that has been used to extrapolate their projections for Carlyon Bay. The choice of Pentewan Sands Holiday Park for this purpose is highly misleading, because the customer-profile cannot reasonably be compared.
- 6.19 On the one hand, we have this developer making claims that the **1,300 metre Carlyon Bay** will be a **world class development**, with potentially 100% residential occupancy and with luxury apartments priced at £300,000 upwards, within **"a first-class, unique, high quality, mixed use, all year around development"**. The accommodation standards (about one third of which will each have double-garaging) will be designed to appeal to those who have substantial means at their disposal, either as permanent residences or second homes. The prospect of winking these people out of their Jaguars, Bentleys and Mercedes onto public transport (which mostly uses a circuitous route, seldom doorstep to doorstep) is, to say the least, slim.



6.20 Clearly, this type of clientele is a very different market to the short-stay Holidaymaker families who enjoy the seasonal facilities available at the **600 metre Pentewan beach**, so that the usage profile would of course be equally different. Either way, should the development proceed, the population of Carlyon Bay would more than double and, with day-visitors the Beach, traffic movements will treble.



6.21 The developer further proposes that *...**"Of the three other beach car parks surveyed it is considered that Gorran Haven provides a similar level of***

attraction and facilities to that proposed, and therefore is a reasonable basis upon which to calculate the additional number of visitor vehicle movements likely to be generated by the development”... Scale ? Facilities? Accessibility ? All those people who might reasonably be described as ‘locals’ might find these propositions to be simply laughable.



- 6.22 There is **Carlyon Bay (1,300 metres)** there is **Pentewan (600 metres)** and there is **Gorran Haven (150 metres)** each about as alike as chalk and cheddar cheese.
- 6.23 However, what is probably the least acceptable part of the traffic case made by the developer is that the Application under consideration is for “**outline**” development only and, **accordingly, we cannot yet know the nature of the finished product, so that virtually all of the extrapolations made for traffic forecasts must rely heavily upon speculation.**
- 6.24 Equally, the measurements taken at the **A390’s key junctions** at Holmbush Road and Daniels Lane, and Holmbush Road and Bucklers Lane, completely ignore the fact that, very shortly, the Tesco superstore is going to double in size, and the new Totem Timber development is again doubled in size. These developments will impact within a few months and, half way up Bucklers Lane, there is a major industrial development site (i.e. employment land) scheduled for development in the near future.
- 6.25 There can be no traffic-correlation yet between the known development and the recently proposed development of the **2,000 new homes by Eco-bos**, together with the proposed massive Coyte Farm development and the 600 homes and Marina at Par Docks, all of which will have a further substantial impact upon the only two main

routes for St.Austell, the A390 and the A391. This latter route already has massive new housing schemes, some already under way, e.g. Lovering Fields and accordingly, we submit that the measurements provided for junction traffic on the main routes are already substantially out of date and insufficiently informative.

6.26 There is also a well-known existing problem for the residents of Tregrehan village who must daily seek to either access or exit the A390 with their vehicles. The fact is that, virtually every day, they must take their lives into their hands, due to the speed of traffic, particularly east-bound. There is no mention of this issue within the transport assessments.

6.27 Perhaps the last word on 'Green' issues should rest with Cornwall Council, who proclaim currently within Chapter 3, the "**Goals and Objectives**" of the consultation document **Local Transport Plan 3, Connecting Cornwall, 2030** :

..."Achieving a lower carbon transport future will be very difficult, and a major change in our transport planning will be necessary to achieve it.

...Why is this important ? Transport contributes 21% of domestic greenhouse gas to the UK total. Within the transport sector, car-associated emissions are by far the largest contributor... In Cornwall the situation is even worse, with 27% of the total emissions attributed to transportation, the highest of any...

6.28 There is absolutely no basis upon which this Application can be adjudged compatible with that enduring truth.

7. Car Parking

7.1 As reported above, even **without** the proposed new development, the roadsides adjacent the crossroads of Beach Road/Sea Road are already regularly jammed with parked cars through almost the entire year. Carlyon Bay Hotel & Golf Course is, more often than not, overflowing with parked vehicles, and people already deliberately park vehicles on these roads because they have been unable to park them on the beach, or have chosen not to pay when charges were levied.

- 7.2 Given the scale of the proposed development of what, if approved, would regrettably become a new 'town' built upon sand, the proposed number of parking spaces set out in this Application is grossly inadequate. If the Council should be minded to grant Consent then it would be **absolutely vital** to ensure that adequate parking is provided which is commensurate with the sheer scale of the development as a whole. As already set out in CBW's formal Objection to the associated Planning Application **PA10/07544**, there is absolutely **no spare capacity for overflow parking in the vicinity, which is already at above saturation-level locally**. Should the Council be minded to approve this present Application, then it must, please, first ensure that adequate **additional public parking is provided at the lower level (i.e. at beach level) prior to any development thereon**.
- 7.3 Further, in the event that this single **PA10/07544** Application is approved, whether in isolation or in concert with the main beach Application **PA11/01331**, it is of critical importance to **ensure that the Definitive Route of the South West Coastal Path No. 36 is both clearly posted, marked and defined** across the proposed car park.
- 7.4 **There can be no reasonable doubt whatever** that because of the totally inadequate parking facilities proposed, the **indigenous population of Cornwall would be denied** that freedom of access to this main Riviera shoreline that it has freely enjoyed for countless generations.



7.5 The above picture tells this truth in an instant. The developer's proposition that parking capacity for the proposed development, which is equal to a new Mevagissey, and doubles the Carlyon Bay settlement, is "**adequate**" completely ignores the fact that the people of central Cornwall and St.Austell, its largest and fast-growing town, will wish to continue to use this beach as of right.

8. Planning Policy Guidance 13, Transport & Traffic

(first published March 2001, updated January 2011)

8.1 The **three primary objectives of the PPG13 guidance** are to integrate planning and transport at the national, regional, strategic and local level to:

- ***Promote more sustainable transport choices for both people and for moving freight***
- ***Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling and***
- ***Reduce the need to travel, especially by car***

8.2 Given that **third** objective, why would anyone propose a development of this nature which, despite the claims of the developer, must have an enormous impact upon traffic movement in Cornwall.

8.3 The evidence speaks for itself. Many of the so-called luxury apartments will each have two car spaces allocated (**511** apartments, and yet **840** undercroft parking spots) and additionally there are to be circa 150 cliff-top parking spaces.

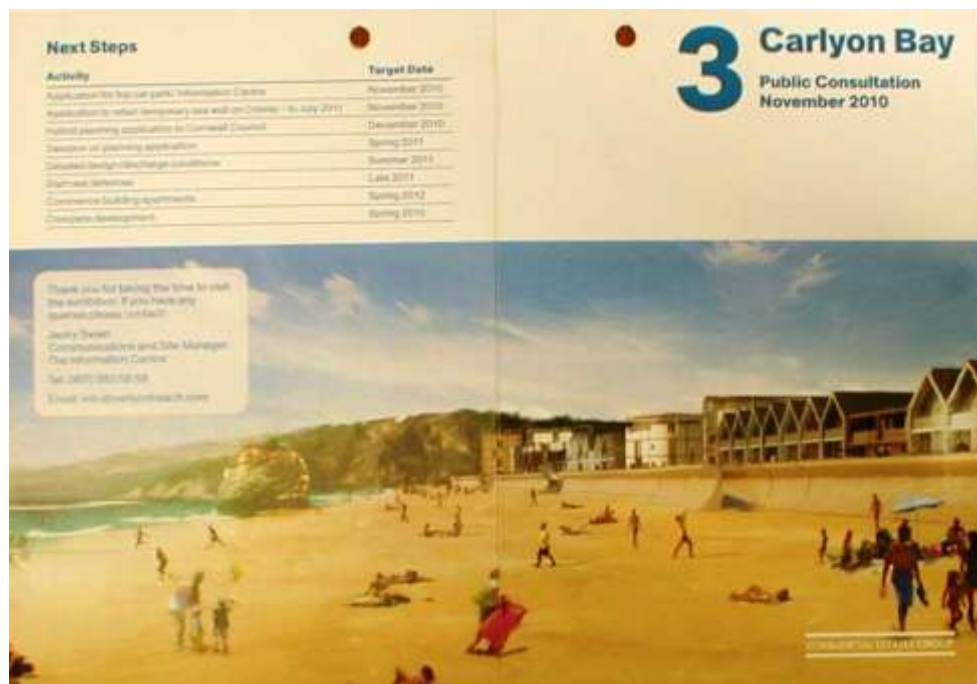
8.4 "***Reduce the need to travel, especially by car***". The impact of incremental traffic movement upon local roads will be to add fuel to an already raging fire ... but there is another, potentially forgotten, much greater impact. No-one can seriously doubt that the use of fossil fuels present modern humanity with one of its most serious threats for a wide range of reasons, and hundreds of millions of pounds of taxpayers money has been poured into the reduction in greenhouse gases. That said, this developer seeks to make the proposed beach development a year-around '***destination of choice***' for new Residents, Holidaymakers,

Shoppers and Day-trippers alike. Indeed the financial viability of the development rests entirely upon the wholesale uptake of its sales-offer.

- 8.5 A recent study led by Dr Myles Allen of the University of Oxford shows that total cumulative emissions of one trillion tonnes of carbon (**1.0 Tt C**, or 3,670 billion tonnes of CO₂) over the entire 'anthropocene' period 1750-2500 causes a most likely peak warming of 2° Celsius above pre-industrial temperatures. Most of the world's governments are committed to avoiding warming in excess of 2° Celsius. Of this budget, emissions to 2008 have **already** consumed approximately half (i.e. **0.5 Tt C**).
- 8.6 Virtually the whole of the developer's submissions in the EA's Section G.2 "Policy Context" must require a significantly distorted thought-process before they could even begin to reflect the over-arching framework of **PPG13**, or even the Connecting Cornwall 2030 Vision statement :
- 8.7 For example, no-one could seriously propose that such a huge development placed upon the largest beach in South Central Cornwall could begin to **"Respect and enhance our beautiful natural and built surroundings through the way in which we travel and deliver transport"**.
- 8.8 The addition of upward of 4,000 extra traffic movements daily through narrow residential routes, and piling this traffic onto the already saturated A390, cannot possibly **"Ensure our communities are safer and more enjoyable places to live"...**
- 8.9 This developer relies, time and again, upon flawed assumptions, simply because the **"outline"** element of the so-called hybrid Application, with its lack of clarity as to whatever may be the final design and planned usage of the site, means that the traffic movement assumptions are largely speculative or, at the least, very unreliable.
- 8.10 It has been accepted by the developer that a Planning Consent for potential 100% permanent occupancy would mean a substantially increased number of vehicle movements, but we are left to make a guess as to what is to be the eventual level and nature of these occupancies, be they permanent, temporary, holiday letting, or second homes, all made worse by the traffic implications of the 100,000 square feet of commercial space.

8.11 All that we do have for conjecture are abundant “artists impressions” of what the completed development might look like, but then again, might not, because they are of course entirely imaginary.

8.12 Take another look, please, at the sheer artistry of the nearly-level beach profile shown on most of the developer’s publicity documents. In order to achieve and to maintain that blissful sub-tropical picture would require well over a million tonnes of new sand, with annual refurbishment, about which the Application is completely silent.



8.13 Drawing upon previous common ground, if there is to be any degree of **sustainability** whatsoever of this proposed construction so close to the sea, then seasonal and after-storm refurbishment of this ‘highly mobile’ beach must be an essential feature. Indeed, virtually the entire expert opinion assembled by the developer was predicated upon this process being maintained strictly and absolutely, **ad-infinitum**. The impact of the resultant heavy-vehicle traffic will be suffered by future generations in the St.Austell area in perpetuity.

8.14 Much is made in the littoral argument of the prospect that **moving the sea wall landward** will obviate the necessity of importing sand for beach re-charge but, having now scaled the plans and measured the ground, we can state that the very small amount of landward movement of the wall-line can be of no influence upon the amount of scour that will continually require that the beach be

replenished. This again must cause a permanent and sustained increase in h.g.v. traffic movements.

8.15 Against the background of **PPG13**, the following table is a **minimal endeavour** to quantify the traffic-movement effect of the **completed** proposal :

- 511 Apartments, average car miles 15,000 per annum = 7,665,000
de minimus (i.e **not** counting the two-car families)
- Day Trippers, avge 200,000 per annum, avge. 30 mile return = 6,000,000
- Shoppers and service vehicles, nominally = 1,000,000
- Staff journeys, 250 at avge 7,500 per annum = 1,875,000

8.16 **In other words, this proposal would directly generate all the pollution of over 16.5 million car-miles annually.** We accept of course that, in the absence of the development, some of these journeys would naturally be offset by travel to alternative destinations, but that cannot seriously offset the staggering increase in car journeys to the so called 'destination of choice' now proposed. And yet the primary 'green travel' objective of **PPG13** is to "**reduce the need to travel, especially by car**".

8.17 The policies set out in **PPG13** are a part of the Government's overall approach to addressing the needs of motorists, other road users and business by reducing congestion and pollution. They will also help to promote sustainable distribution. In this way, planning policies can increase the effectiveness of sustainable transport choices toward improving our quality of life.

8.18 The **PPG13** Traffic Guidance (at section 37) also states that developments involving leisure, tourism and recreation which generate large amounts of travel should accord with the advice contained in this guidance and further (section 11) that **local air quality** is a key consideration in the integration between planning and transport.

8.19 In section 67 of the Guidance, it is stated that traffic management measures should also be promoted to improve the quality of local neighbourhoods,

enhancing the street environment and improving road safety, particularly in **sensitive locations** in both urban and rural areas such as residential areas, and near shops and **schools**. In making decisions on the management of traffic, Local Authorities should also consider the effects of measures on surrounding areas. At the very least, any Consent should include a bonded contribution to cover the cost of resurfacing Beach Road to a Highways standard, together with the cost of bringing Sea Road North to adoption standard.

- 8.20 Notwithstanding the fact that the residential roads of Carlyon Bay (Haddon Way, Chatsworth Way, Fairway and Sea Road) have all for twenty-plus years been by-law designated "**Access Only**", there is already a serious "rat-running" problem with motorists seeking to avoid the grossly over-built speed humps along Beach Road. The anticipated increase in traffic resulting from this development can only serve to exacerbate this problem.
- 8.21 Residents' access to and from their homes along the 'inner' roads such as Crinnis Wood Avenue, Appletree Lane, Crinnis Close, Gloucester Avenue, Windsor Drive, Kent Avenue, Edinburgh Close and Wheal Regent Park will be further restricted by the sheer weight of beach traffic movements, and the inevitable nuisance of further "traffic calming" measures.
- 8.22 The previous Chancellor of the Exchequer stated that by **2015**, there would be 26.3m cars on the UK roads, having grown by 10% over a ten-year period. More locally, Cornwall County Council's 2003 twenty-year forecast was for a 50% growth in traffic movement by 2023. **Thus, we are moving toward an exchange of "acknowledged saturation" for potentially total gridlock.**
- 8.23 **The soon to be lamented SWRDA**, in its publication **The Way Ahead**, (May 2006) **emphasised** the importance of creating infrastructure **before** permitting development, It states:

"For urban development on this scale to be effective, planning systems need to be holistic ... Population growth, provision of infrastructure and business development have to be better co-ordinated, regardless of where administrative boundaries might lie. In future, new infrastructure must encompass the range of public services needed to support extra homes, not just roads and transport services".

- 8.24 **As to population growth, the former 'Restormel' area** is already growing more rapidly than anywhere else in Cornwall through housing and population, by around 2,500 homes (more than 5,000 people) annually. For another 20 years, Cornwall's population will grow faster than almost anywhere in the UK, with a worrying predominance of older people.
- 8.25 The Alliance Trust (February 2005 Survey) found that Cornwall's population has increased over 13% in 20 years, with 22% of its population now elderly. These 100,000 pensioners will increase by more than 70% to 170,000 within 15 years.
- 8.26 In 2004/5 the Council commissioned a very expensive preparatory study into the Local Transport Plan for St.Austell, which revealed that just to solve the town's existing traffic problems would require **£30 millions (at 2005 prices)** and this is money that is simply not available. There is no available offer of a contribution toward the anticipated millions in cost of improvements to A390 alone.
- 8.27 Since that survey was undertaken Tesco, Aldi, Lidl and Asda have all either expanded or will expand shortly, and Sainsbury have indicated their interest on the western edge of town. The picture is even worse because, since that survey, large new housing estates have developed at Duporth and Penrice, with a large amount of 'infill' at other nearby locations. Take into this mix the current 2,000 homes proposals for the Eco Towns, the proposed new Marina with 5-600 houses at Par Docks, the enormous number of new homes recently built at Carclaze, Penwithick and the truly massive proposals for Coyte Farm, and here you have a recipe for utter traffic chaos. Just one recent week in the local press makes the point succinctly :



- 8.28 Members of Cornwall Council must take their cue from the research undertaken for the Cornwall Core Strategy which demonstrates that for the period under review, the County's population will rise by over one-fifth, and the number of households by one third. Clearly this level of growth demands that Members observe an absolute duty to ensure that their current decisions recognise the fact that there has been zero investment in the new infrastructure that is essential to support development on this huge scale.
- 8.29 PPG 13 (in paragraph 27) calls for tailoring, reducing or splitting large projects to other sites highly accessible by non-car modes. In other words, simply building another roundabout on the A390 will NOT solve these problems.
- 8.30 A reminder: The deliberately-styled "Hybrid" nature of this Planning Application would, if approved, mean that this developer can construct a truly massive sea wall on one of the best beaches in Cornwall without any clear commitment whatever as to what is to be built behind it. In other words :

£ 000,000,000,000.

Pay: THE DEVELOPER

1ST. April 2011

..... **A BLANK CHEQUE**.....

Joe Public

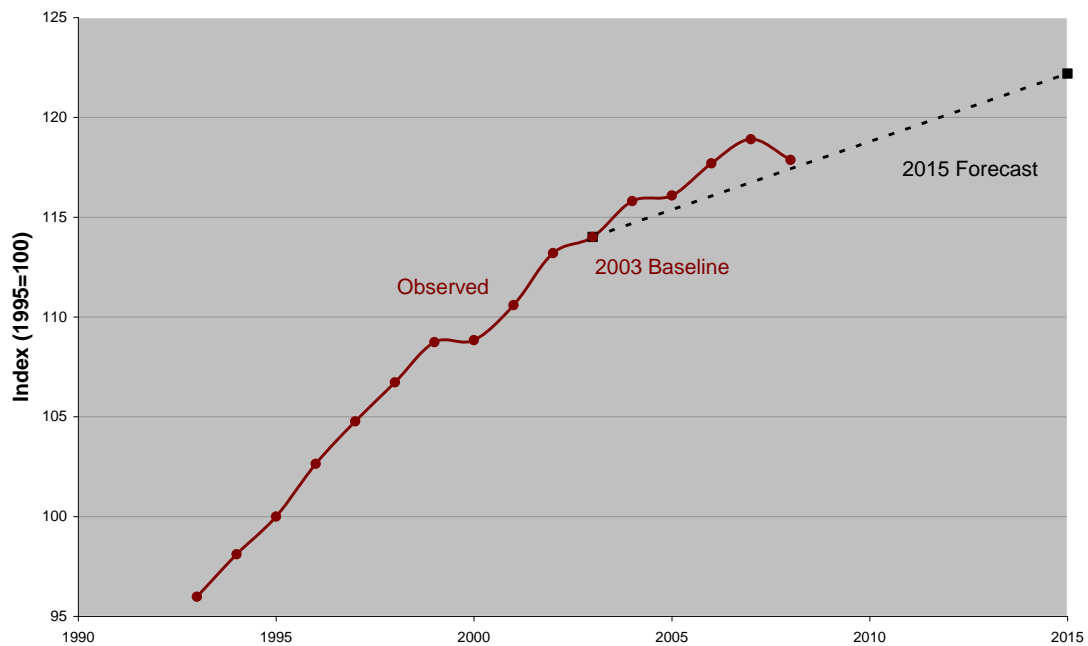
Bank of Planning

9. Future Traffic Growth : Road Transport Forecasts, 2009 onward.

Results from the Department for Transport's National Transport Model

- 9.1 **Section 1.5 The Model Base Year** - All forecasting models require a base year on which predictions can be based. The choice of an appropriate base-year is driven by a range of criteria - it is not necessarily best practice to pick the most recent year for which data is available.
- 9.2 First of all, required data needs to be final to minimise the risk that future revisions will occur. Given that the National Transport Model requires a wide range of data, for example, on behavioural observations, traffic volumes, economic series, prices and emissions, the scope for having a very recent base-year is limited.
- 9.3 In addition, base-year data should be 'uninteresting' in the sense that the likelihood of external shocks influencing the data is minimal. Government budget documents often look at years where the output gap of the economy is small suggesting the economy is operating at capacity (see HMT, 2008c which shows 2003 as having a low output gap). We also need to choose a year where there are no significant shocks. Such shocks would include widespread fuel protests (e.g. in 2000), outbreaks of animal diseases (e.g. foot and mouth in 2001), recessions or large variations in oil prices. Finally, frequently updating the base year reduces the comparability between subsequent forecasts. The NTM base year is currently **2003**, and has been chosen **taking all of these facts** into account.
- 9.4 **Section 1.6 Performance against observed data.** The NTM is designed to forecast long-term trends (currently 2015, 2025 and 2035) rather than individual years. It therefore does not provide insight into the precise path between the base year and forecast years. Figure 2 compares this year's short-term forecast to 2015 to observed TSGB data on traffic.
- 9.5 The short-term forecast to 2015 follows the trend of the observed data to 2008 closely. The short-term forecast implies that, on average, traffic will grow by around 0.5% per annum between 2008 and 2015. It is likely that in any individual year the growth rate could deviate considerably from this average. Given the macroeconomic circumstances of 2009, a further fall in traffic could reasonably be expected for 2009, as occurred in the recession of the early 1980s.¹ Conversely, the return to economic growth predicted to begin in 2010 and to gain strength in 2011 is likely to lead to traffic growing more strongly than the average annual rate forecast for the 2008-2015 period.
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9.6 **Figure 2 below: NTM 2015 Forecast and Observed Traffic Data, England**



Source: Traffic data from DfT (2009); Traffic forecast from the NTM. **This shows five percent growth 2010 to 2015 even allowing for exceptional circumstances and about thirteen percent above the 2004 figure, the date of the last Refusal.** ¹ This year's forecast is based on HMT forecasts of GDP published in Budget 2009. In the 2009 Pre-Budget Report these numbers were revised further down for 2009.

9.7 Traffic has been an issue for Carlyon Bay for nearly sixty years... In **1953**, the Ministry of Housing and Local Government **dismissed an Appeal** seeking to place just 20 residential caravans on this site ! One of the reasons then given was the problem of **traffic generation**, and that became Cornwall County Council's consistent position, Application after Application, all the way up to the Public Inquiry in 2006.

9.8 **Costly Report after costly Report after costly Report** has registered the traffic problems of St.Austell and, **in particular**, the A390 corridor and the A391-A30 connection. By example :

Cornwall Structure Plan 2004

St.Austell Transportation Study 2004

Cornwall Towns Study 2005

Cornwall Local Transport Plan 2006-2011

Economic Growth in Cornwall, the Strategic Road Network 2007

St.Austell Bay Community Strategic Action Plan 2008

Core Strategy Report 2010 (above-referred) and now, the

St.Austell Area Transport Modelling Report, January 2011.

The countless thousands of pounds of the public's money spent upon these Reports has an abundantly clear outcome : The A390 simply cannot properly cope with traffic demand, and is running at capacity throughout the year and even worse in high season.

9.9 So what on earth are the prospects when adding well over a million extra traffic movements annually to/from Carlyon Bay onto this badly constipated main route ? Any daily commuter on this route can tell you that for free !

9.10 Whilst all traffic to and from Carlyon Bay must access the A390 at one or another junction, the developer's latest assessment of traffic movements has almost miraculously halved within the space between two applications. Even so, the additional traffic movement estimate (which we believe to be understated) is still circa 1,000,000 per annum. This still imposes an almost immediate additional 11% load upon the already saturated A390.
