

The case against the Kensey Link Road, with reference to the lack of implementation of traffic-reducing policies in Launceston

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1. The consultations

The 1997 consultation gave no information about the type of environment that would be destroyed by construction of the road. Environmental factors are central to many people's acceptance or rejection of construction schemes. Such knowledge might have significantly reduced the proportion of respondents who backed the proposal to build the road.

There were also serious discrepancies at the 1997 exhibition as to the route of the proposed road. In addition, as I pointed out at the time to the County Council, many people - both private individuals and businesses - did not appear to have received the leaflet and questionnaire, but the council representative to whom I spoke (Bob Merriman?) seemed unconcerned about this. When considering spot-checks to ascertain the incidence of non-receipt, I suggested using the electoral register, but the council representative stated that he did not know how to access it!

The 2003 consultation was also markedly flawed, in that:

- (a) there was little material for people to take home and peruse in detail;
- (b) I had great difficulty obtaining a copy of the Phase I Ecological Assessment, to which I wished to refer in my completed questionnaire which had to be returned within a short time-scale; *and*
- (c) the website cited on the leaflet was unavailable during the consultation period.

The lack of take-home material and availability of the website will inevitably have affected the number and nature of responses. 25% of people in Cornwall have no access to a car, and trying to fit the exhibition into a shopping trip using the lamentably limited public transport system serving Launceston will have greatly restricted such people's ability to take in all the information which they may have wished to peruse, especially at busy times which required people to wait to view exhibits or speak to staff. Some non-drivers working in the town will have had to try to 'do' the exhibition in short lunch-breaks, because what public transport there is finishes in the early evening. Many car-less people, especially the disabled, will not have been able to visit the exhibition at all. As a result, such people will not be proportionately represented in the response sample and a spuriously pro-car agenda may consequently be assumed. Non-drivers would be more likely to prefer Option 1 of the road plan as it would present less of an obstacle and traffic hazard to pedestrians and cyclists than Option 2.

Several council staff have displayed a nonchalant and casual attitude when concerns are raised about the diverse problems related to the consultations, which is inappropriate when schemes which would seriously affect many people's local environment are involved. I have recently received an letter from the county council stating that the Ecological Assessment should make no difference to which option is preferred. This was not apparent until I was able to peruse the assessment at home, and is only true because the assessment **did not look** at the section of Ridgegrove Hill north of the link road route, which would suffer ecological damage if Option 2 were implemented, as I will elucidate later in this paper (*see* Section 3.1).

Clause 3 of Annex C of Planning Policy Guidance (PPG) 13 states: "For other transport proposals, including changes or extensions to projects already executed or authorised, EIA is required if the particular development would be likely to have significant environmental effects."

Thus an assessment would also need to be carried out on the northern section of Ridgegrove Hill before Option 2 could be implemented.

The 2003 consultation *has* provided some environmental information but residents are now only being asked which route they prefer, not whether they approve of the road *per se*.

Also, the Phase I Ecological Assessment has some important omissions. It omits to mention the mature oak tree in the disused railway cutting through which the Kensey Link Road would pass. It states that no records were found of reptiles and amphibians, when I personally submitted such records to the Cornwall Wildlife Trust for several years. It describes the eastern cutting as 'impenetrable': despite my disability I walked the length of this cutting a few months before the assessors conducted their survey. The assessment also refers to this cutting as 'drier' than the western cutting, despite the fact that there are springs shown on the maps at the closest point of the cutting to the route of the link road. I can testify to the fact that this area is boggy and at an advanced stage in developing into wet woodland, so may have a similar ecological importance to the western wet woodland. There also appears to be at least one swallow-hole here; these are places where watercourses disappear from the surface and continue underground. I will submit more detailed ecological information later.

In this review I have assessed the Kensey Link Road scheme against international, national, county-wide and local regulations, guidelines, strategies and consultation findings, and drawn attention to the lack of action taken to implement the recommended strategies in the Launceston area. Some repetition has been unavoidable due to collective reference to a range of different issues in the government's and council's own documents and subsections thereof.

2. What is the Kensey Link Road *for*?

As stated above, 25% of people in Cornwall have no car and the same percentage have no access to a car (1991 census findings). So the road is presumably for the 75% who do, and for freight.

Measures cited in Detailed Strategy 2 of the Local Transport Plan (LTP) to ensure that transport strategies enhance walking facilities include *reducing* the domination of motor traffic in residential areas. The strategy of the Launceston Transport Forum is to *reduce* traffic in residential areas (my italics).

The Kensey Link Road would transfer through-traffic to the residential Kensey Valley housing estate.

It is purportedly intended to remove traffic from '**less suitable routes**' (2003 consultation).

Option 2 of the Kensey Link Road scheme would allow through-traffic - including large vehicles - to transfer to the northern section of Ridgegrove Hill and thence, via a sharp bend at the ancient Ridgegrove Mill, to Ridgegrove Lane. Both Ridgegrove Hill and Ridgegrove Lane are quiet roads used by walkers, cyclists and horse-riders, and the former becomes impassable on occasion due to flooding.

Arguments that such traffic would not use this route ignore the fact that traffic on Newport Industrial Estate is frequently halted by large vehicles using the entire width of the

carriageway to gain access to units on the estate. If traffic increased significantly on the industrial estate (as would occur if the Kensey Link Road were built) such events would lead to substantial tailbacks in both directions, leading to impatient drivers seeking alternative routes.

The proposed link road would only provide a relatively straightforward link from the A388 north of Launceston to the *eastbound* carriageway of the A30 and Lifton (and for its converse: westbound A30 traffic and traffic from Lifton to the A388 north of Launceston), and even this involves using Polson Bridge, which is unsuitable for heavy traffic or large lorries. Traffic to and from Holsworthy and Bude already has routes to and from Okehampton, Exeter and the east via primary routes in North Devon, and there is already a road from the A388 two miles north-east of Launceston for access to Lifton, so most of the A388 traffic travelling southwards through Launceston is likely to be continuing southwards or westwards. To access the westbound A30, the A388 to Plymouth and the B3362 to Tavistock, southbound traffic using the link road would have to negotiate the tight bend at Prout's Corner and travel along the mainly-residential Tavistock Road (designated as an on-road cycle route - also *see* Section 4.1.3.2), or else travel along Exeter Street from Prout's Corner and thence up the steep and rather narrow Race Hill or along Madford Lane to join Western Road. This does not appear to be a 'suitable route'.

2.1 Tackling congestion

Detailed Strategy 3 includes 'changing public attitudes to car use', 'traffic calming and restrictions in residential areas', 'increasing the attractiveness and availability of other modes', 'encouraging alternatives to travel' and 'reducing the need to travel' as measures to address congestion, pollution and noise.

Note that road building is *not* included as such a measure.

Dockacre Road

The Kensey Link Road is purportedly intended to reduce traffic levels and congestion in Dockacre Road (1997 consultation).

1. I have never observed congestion here despite crossing this road regularly on foot; I encounter only light traffic when doing so, so wonder whether a sledgehammer is being proposed to crack a nut. The road is, however, unsuitable for through-traffic due to its narrowness and poor connections to major routes in comparison with Pennygillam roundabout. I cannot understand why such traffic is directed to use this road; perhaps it is due to habit.
2. The cheapest and least environmentally-damaging way to solve this problem - if it exists - is to introduce restrictions to prevent the use of Dockacre Road by through-traffic, such as 'No Entry' and one-way measures, and to improve signage so that through-traffic is clearly directed to the more suitable route incorporating Pennygillam roundabout and Western Road/St Thomas Road.

Newport

The Kensey Link Road would not reduce congestion between Newport Industrial Estate and Riverside, which is largely due to parking outside Newport Post Office and the narrowness of Kensey Bridge. The construction of the Newport Relief Road might achieve this, but a simpler and cheaper solution would be to construct a footbridge next to the current bridge and convert the existing footway into part of the road carriageway, thus widening it. Once all

recommended measures to reduce traffic overall have been implemented, this might be found to be sufficient to cope with the remaining, essential traffic. If parking outside the Post Office is still causing problems, perhaps the Post Office could be moved to a different location close by which has better parking facilities.

As stated elsewhere in this review, it is unacceptable to simply transfer a problem to a different location and, as pointed out earlier, the transfer of traffic to the Kensey Link Road could lead to frequent congestion at both ends due to traffic being halted by large vehicles blocking the carriageway on Newport Industrial Estate. Congestion at both ends of the link road is also likely to result if traffic-calming measures are put in place on the new Kensey Valley residential estate (the desirability of such measures is illustrated in Section 3.4.1).

2.2 Reducing accidents

Analysis of the accident statistics for the period 1.10.1997-30.9.2002 reveals that 52.5% occurred outside the periods from 0800 to 1800 from Monday to Friday, which will be referred to hereafter as the 'main traffic period'. This suggests that congestion may not be a significant factor in accident incidence. The various accident locations will be analysed in more detail below for the main traffic period.

Dutson Road north of Roydon Road

Three accidents: nos. 71,73 and 74. One only involved contact between mirrors on vehicles, another involved a car hitting a wall (no other vehicle involved) and the other caused slight injury.

Comments: These accidents may not have been related to congestion in St Thomas Road or Newport. If they were not, the combination of the Kensey Link Road and Newport Relief Road would not reduce traffic here.

Between Newport Roundabout and Dutson Road/Roydon Road junction

Ten accidents, two of dubious location (location on map does not tally with textual description). One involved an HGV unable to negotiate the roundabout and one involved an elderly pedestrian walking into the road. Four involved injury, one serious.

Comments: The Kensey Link Road alone would not reduce traffic here. The addition of the Newport Relief Road would take some traffic travelling from Holsworthy but it would not reduce the net volume of traffic using the roundabout, the Dutson Road/Roydon Road junction and/or the new junction between Dutson Road and the Newport Relief Road. There may be scope for improving the current junction and roundabout to reduce accidents.

St Thomas Road from Newport Industrial Estate to Newport Roundabout, excluding roundabout and junction with industrial estate

Six accidents, three involving slight injury, two of which were outside Greenaways Garage. Two or three accidents involved parked vehicles and another involved a car hitting a wall, no other vehicle being involved.

Comments: The Kensey Link Road alone would not reduce traffic here: the Newport Relief Road would also be required. Enforcement of parking restrictions would probably reduce accidents.

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Junction between St Thomas Road and Newport Industrial Estate

Two accidents. No injuries. The description for no. 35 (involving a goods vehicle) does not appear to make sense - the directions seem wrong.

*Comment: The Kensey Link Road would lead to **more** traffic turning at this junction.*

Newport Industrial Estate

Three accidents, all resulting in slight injury, one to a pedestrian. One accident was due to an object in the road, another due to a driver's view being blocked by a lorry.

Comment: This would become part of the Kensey Link Road: thus traffic would increase greatly. Vehicles of all sizes are continually entering and leaving industrial units, with large vehicles having to use the entire width of the carriageway to do so. This is not an appropriate environment for the increased traffic levels which would result from the completion of the Kensey Link Road.

St Thomas Road from Newport Industrial Estate to, but not including, junction with Wooda Lane and Wooda Road

One or two accidents, one of these being of dubious location and the other involving a parked vehicle. No injuries.

Comment: The vast majority of accidents here were outside the main traffic period, thus unlikely to be congestion-related.

Junction between St Thomas Road and Wooda Lane/Wooda Road

Five accidents, three involving slight injury.

Comments: This is a dangerous, near-blind junction. Through-traffic should be strongly discouraged or even prevented from using it, and be directed instead to use St Thomas Road, Western Road and the Pennygillam roundabout.

Wooda Road/Dockacre Road

Three accidents. One involved slight injury to two pedestrians, another involved a car hitting a wall due to glare from the sun.

Comment: The same number of accidents occurred outside the main traffic period although, of these, two are of dubious location and the other involved a parked car.

Kensey Hill

No accidents outside main traffic period. Of those five which did occur, two are of dubious location and four involved parked vehicles.

Comment: The Kensey Link Road would greatly increase traffic here, and the risk of collision with parked vehicles (outside residential properties with no off-road parking facilities) would increase substantially.

Thus the evidence that the Kensey Link Road would significantly reduce accidents, even with the addition of the Newport Relief Road, is very weak. Any possible reduction in the St Thomas Road/Newport area would be likely to be offset by increases elsewhere. **LTP**

Detailed Strategy 3 warns against 'merely displacing a problem'. Accident reduction could, however, be achieved by net traffic reduction (addressed in Section 4.1), junction improvements, parking restrictions and signage amendment.

3. Undermining the 'Vision for Cornwall'

The Executive Summary of the LTP states that the overarching transport aims and objectives are designed to support the values of the 'Vision for Cornwall'...providing the basis for a SUSTAINABLE QUALITY OF LIFE AND ENVIRONMENT for its people, reflected in a county with an ecologically sound, aesthetically pleasing and pollution-free environment...where access is provided for people and goods by an appropriate, effective, energy-efficient and environmentally-friendly transport system.

Appendix C of the LTP states that 'ALL proposals will contribute to quality-of-life aims.' (my emphasis)

As it would fragment and otherwise damage a rural, peaceful, wildlife-rich environment - part of the 'special' nature of Cornwall - the Kensey Link Road would be detrimental to the 'ecologically sound' and 'aesthetically-pleasing nature of the county', the importance of which the Executive Summary stresses as a characteristic of **Cornwall as a 'special place'** in the **'Vision for Cornwall'**.

Private car transport is not energy-efficient or environmentally-friendly, and road-building tends to increase traffic levels. The Kensey Link Road, which would merely accommodate demand for private motor vehicle travel and unnecessary transportation of goods, is completely out of kilter with international, national and regional guidelines.

The road scheme is inconsistent with the key environmental objective to **'protect and enhance the natural environment, landscape, heritage or built environment' (LTP Strategy document)**. It would *damage* the natural environment and landscape and, in the case of Option 2, threaten the heritage represented by Ridgemoor Mill and also by Ridgemoor Hill, the ancient route into Launceston (*see* section 3.4.2).

3.1 *Not 'ecologically sound'*

The fragmentation and destruction of rich wildlife habitat, including a piece of rare wet woodland, would lead to wildlife deaths during both construction and use of the Kensey Link Road. Animals affected would include a wide range of songbirds plus foxes, badgers, rabbits, squirrels, owls, pheasants, slow worms, frogs, toads, grass snakes and quite possibly lizards, roe deer, bats and otters, all of which have been seen or heard in the vicinity. Badgers and their tracks have been seen on and near the site of the planned road by residents of Monks Park Cottages.

Option 2 of the scheme - allowing through-traffic, including large vehicles, to transfer to the northern section of Ridgemoor Hill - would be especially damaging to wildlife. Otters have been seen in the River Kensey at Ridgemoor Bridge (in the northern section of Ridgemoor Hill) and in the mill leat, dippers have also been seen in the river below the bridge, and I have personally witnessed a kingfisher feeding from the leat, using a perch on the mill house immediately adjacent to the road. The mill - on a sharp bend - is home to swallows and at least two species of bat, the latter regularly feeding around Ridgemoor Bridge. Use of this bend by unsuitable traffic would pose a serious threat to wildlife.

The leat is often teeming with frogs, toads and newts and their tadpoles, and adult toads are found in the mill garden, again next to the road. It should also be noted that Ridgegrove Hill floods on average several times a year when the River Kensey overflows Ridgegrove Bridge, and it is not uncommon for the area around the mill to flood as well. Vehicles passing through floodwaters would pollute the river and leat, especially if, as sometimes occurs, they became stranded. The river supports a range of fish species including eels and, I believe, salmon, as well as dippers, kingfishers, moorhens, ducks, herons and at least two species of damselfly including the Banded Demoiselle (*Agrion splendens*) which has only localised distribution in Cornwall.

3.2 *Not 'aesthetically pleasing'*

Construction of the Kensey Link Road would destroy the peace and visual amenity of Monks Park Cottages and, in the case of Option 2, of Ridgegrove Hill north. Many people have chosen to live in this area for the peace, quiet, safety and pleasant natural environment where the dominant sound is usually birdsong. The Kensey Link Road would drown this out. It would also change the residential road through the new Kensey Valley Estate to a busy, noisy road, completely and adversely transforming the environment for nearby residents and deterring people from performing outdoor activities, including for health reasons (*see* Section 3.4.1). The council should take into consideration the potential cost of compensating residents affected by any of the factors listed below which would reduce the value of their properties:

- Noise
- Vibration
- Smell
- Fumes
- Smoke
- Artificial light
- Discharge onto the land of any solid or liquid substance.

A recent report (*see* Section 3.4.1) may lead to the criteria for compensation relating to fumes being broadened, as it shows adverse effects on children a considerable distance from roads. The research showed that, for each 100m closer to a main road, the day-time coughing rate in children aged 1-5 years went up by 3%, and the rate of dry night-time cough by 2%.

Continuing with the 'business as usual' bad old habit of building new roads would condemn Cornwall to becoming the kind of urban, road-dominated sprawl from which people have moved for a better quality of life, and from which others escape for their holidays. I have seen such urbanisation befall much of my own home county (Hertfordshire) since the 1960s - a reason why I would not want to live there now.

3.3 *Not 'pollution-free'*

The Draft Regional Transport Strategy referred to in the LTP Policy document has six key objectives, including reduction of the impact of transport on the environment (which is threatened by growth in road traffic, noise and pollution)...

"The 'Demand Management and Modal Shift' section of the UK Climate Change Programme Consultation Paper (1998) is of particular relevance to the County Council's role as the Local Highway Authority...pollution hotspots can occur through a

combination of local factors...(Data from monitoring) will allow decisions to be made in a manner which best incorporates air quality considerations into transport planning... Results (from low-level ozone monitoring) suggest that (Cornwall's) levels are amongst the highest in the UK and levels in excess of the standards contained within the National Air Quality Strategy are occurring." (from the 'Integration' section of the LTP)

The 'Integration' section also states: "It is considered that the key objectives of the LTP, particularly the focus upon reducing the need to travel, demand management and promotion of alternatives to the private car, embrace the aspirations in the Climate Change Paper and, hence, will contribute to improved air quality within the county."

Valleys trap pollution. The trapping of exhaust fumes from link road traffic would pose a health hazard to residents of Monks Park Cottages, the northern part of Ridgegrove Hill and the lower parts of the new Kensey Valley housing estate. The fumes would also threaten pedestrians and cyclists using the east-west path as the road would run alongside it. Walking or cycling beside a busy road is equivalent to smoking a number of cigarettes.

3.4 What else is special about Cornwall?

Cornwall is rightly seen as a safe place, ideal for bringing up children. It is also valued for its architectural heritage.

3.4.1. Health and Safety

The road scheme is inconsistent with the key environmental objective **'to enhance the quality of life including local amenity, health and safety...in the built environment'** (LTP Strategy document). It would encourage private car use and discourage walking and cycling, threaten the health of local residents by polluting the Kensey Valley with vehicle exhaust fumes and create noise and danger for residents of the new Kensey Valley estate, Monks Park Cottages and Ridgegrove Hill plus, in the case of Option 2, pedestrians and cyclists using Ridgegrove Hill and Ridgegrove Lane.

The 'Integration' section of the LTP states: "Through its land use and transport policies and programmes, the County Council is well-placed to make a valuable contribution towards the Government's objectives for health improvements and to assist in meeting national health and environmental targets. In relation to the Government's health objectives, the key areas over which the LTP will have the most influence and greatest impact is (*sic*) in relation to accident reduction, air and noise pollution, access to facilities and services (social exclusion) and general health (through measures to encourage exercise, i.e. walking and cycling)."

Policy Tran 8 of the County Structure Plan states that "Priorities for road schemes will be targeted on the Primary Route Network and determined with regard to the extent that they...improve safety for *all* road users...and achieve environmental benefits through traffic removal from communities and other sensitive areas." (my italics)

LTP Detailed Strategy 3 warns against 'merely displacing a problem'.

Clause 4.32 of the Structure Plan Transport section states: "...the available resources for road construction must be carefully targeted. Priorities must be based on schemes concerned with removing through-traffic from communities, road safety concerns and poor highway alignment, rather than merely increasing road capacity."

As elucidated elsewhere in this critique, the Kensey Link Road would transfer traffic from one community to another and reduce road safety - especially for children - '**merely displacing a problem**' and '**merely increasing road capacity**'.

Measures cited in Detailed Strategy 2 of the LTP to ensure that transport strategies enhance walking facilities include reducing the domination of motor traffic in residential areas. The strategy of the Launceston Transport Forum is also to reduce traffic in residential areas, and clause 4.28 of the Transport section of the Structure Plan states that "...it is important to avoid a diversion of traffic, especially heavy goods vehicles, to less suitable roads."

The 'Investment' section of the LTP states: "Particular attention will be given to safety of young people. The aims will be to raise awareness of child vulnerability within communities and to introduce schemes to make the environment safer. These initiatives aim to improve safety...in other locations where children tend to be vulnerable, such as around home, by establishing a co-ordinated approach in order to reduce vehicle speeds, provide safer crossing points, and improve(d) cycle and pedestrian facilities."

Unlike the currently-used mixed-residential and commercial St Thomas Road - which leads via Western Road to the main roundabout at Pennygillam - the completely residential new Kensey Valley housing estate has a number of public open spaces, the largest of which is immediately adjacent to the road. Unlinked, this road is relatively safe for children to cross and to cycle along: it is a residential road. If the road were linked to Newport Industrial Estate, changing it to a through-road, traffic would abruptly increase both in terms of volume and in terms of vehicle size and, if traffic-calming measures were inadequate, in terms of speed.

The 'Integration' section of the LTP states that the county has a high incidence of speed-related accidents. It also states: "Health is influenced by many factors and transport, in particular, is recognised as having an impact on the quality of life...air and noise pollution...can have significant health implications and road traffic accidents are a major cause of avoidable ill-health, injury and death...road accidents are a major cause of accidental injury and death among children and young adults."

The Executive Summary section of the LTP states that local problems with speeding traffic, public transport and lack of facilities for pedestrians and cyclists have been identified. Launceston appears to be a clear example of such local problems and thus one in need of urgent action in these areas.

Kensey Hill, which joins the road to the south, already has a problem with 'boy racers'. If the road were converted into a link road to Newport and traffic-calming measures were inadequate, the problem would be certain to grow - the linkage would provide these miscreants with an irresistible 'racetrack', especially during evenings and weekends, making life a misery for Kensey Valley residents and the vicinity a no-go area for children and a graveyard for pets. I have personally witnessed the death of my own cat under the wheels of 'boy racers' in Dutson Road, and many of these irresponsible drivers would be delighted with the opportunity to extend their racetrack from Dutson to Kensey Hill and beyond.

Policy Tran 7 of the County Structure Plan states that "New development proposals should be compatible with the effective management and safe movement of traffic..."

Detailed Strategy 1 states that Cornwall County Council will seek to promote child safety...through...engineering means.

However well children were warned of the new dangers, their instinctive behaviour would not change rapidly enough to ensure their safety. This would also apply in the scenario of a simple increase in traffic volume even if speeds were successfully controlled. Children playing on the public open space next to the road are likely to run into the road when a ball or other toy goes astray onto or across the road. Younger ones in particular will run across without looking, purely out of habit. If vehicles stop suddenly in heavy traffic to avoid hitting children, pile-ups tend to result, posing an additional hazard to bystanders as well as to vehicle occupants. Even if a barrier were constructed to prevent or reduce the risks, those using the public open space next to the road would be exposed to high levels of nitrogen oxide, ozone and diesel particulates, exacerbating asthma, bronchitis, hay fever and other respiratory illnesses.

Regarding the study referred to in Section 3.2, Dr Jonathan Grigg, from the Leicester University Children's Asthma Centre, has recently said: "Our study has provided clear evidence that particles from vehicles are a significant irritant on the airways of young children" and "road traffic experts should place greater emphasis on health effects when planning new roads." Dr John Harvey, of the British Thoracic Society, has said: "It is essential that we work together to limit the impact of road traffic pollution on the health of young children's lungs..." Exposure to traffic fumes has also been linked to fertility problems. (see BBC webpage <http://news.bbc.co.uk/1/hi/health/3254448.stm>).

Children wanting to visit friends on the opposite side of the estate would have to cross the Kensey Link Road, which would be dangerous on foot or bicycle.

Most residents of St Thomas Road will have moved there knowing that it was a busy road, unlike those in the Kensey Valley Estate, Monks Park Cottages and Ridgegrove Hill who expected their area to remain quiet and safe.

Detailed Strategy 3 states: "It is intended that the sealing of 'rat runs' will return many residential roads to residential users."

The Kensey Link Road would do exactly the opposite, channelling traffic from the mixed-residential and commercial main route to the main roundabout, comprising St Thomas and Western Roads, to all-residential areas, in effect **creating** a 'rat run'. Option 2 of the link road scheme would lead to vehicles, including large lorries, attempting to use Ridgegrove Lane, some via Ridgegrove Hill to or from the link road, as a 'rat run' when tailbacks resulted from traffic being halted on Newport Industrial Estate by articulated lorries using the entire width of the carriageway to access some commercial units - a frequent event. This would pose a hazard to pedestrians such as children from Ridgegrove Estate walking to and from school, families taking weekend leisure walks, and also horse-riders. Unsuitable vehicles trying to negotiate the sharp bend at Ridgegrove Mill would pose a hazard to residents of the mill house and The Old Granary at the bottom of Ridgegrove Hill. Ridgegrove Hill is currently a quiet, safe road - essentially a country lane - popular with walkers and part of the Two Castles Trail.

Safety issues will be also be addressed in Sections 4.1.3 and 4.1.4.

3.4.2 Heritage

Ridgegrove Hill is the ancient route into Launceston, with the original cobbles still visible in places at its edges. Ridgegrove Mill at its northern end is featured in the Domesday Book and its water-wheel has been restored in the last few years. Option 2 of the Kensey Link Road scheme would allow through-traffic - including large vehicles - to transfer to the northern section of the hill and attempt to negotiate the sharp bend at the mill, posing a threat of damage.

As stated above, Ridgegrove Hill is part of the Two Castles Trail.

4. What international, national and local strategies *do* advocate

Clause 4 of Annex C of PPG 13 states: "In planning for local infrastructure, including roads, local authorities should ensure that their approach is compatible with the new approach to appraisal (NATA). Particular emphasis should be given to the need to explore a full range of alternative solutions to problems, including solutions other than road enhancement."

4.1 Demand management

Appendix C of the LTP states: "If no action is taken, road traffic in Cornwall is predicted to increase by a further 32% to 62% in the period from 2000 to 2009..."

Appendix D of the Transport section of the Structure Plan states that 'the meeting of demand for movement of people by private car is now "seriously questioned - in terms of global impact (climate and air pollution), resource use (fossil fuels), impact on the countryside (wildlife, landscape, historic heritage) and urban congestion. The land-use and transport strategy of the Structure Plan *must* tackle this.' (my italics)

Clause 4.2 of the Transport section of the Structure Plan Transport section states: "A more energy-efficient and environmentally sustainable transport system for Cornwall will give greater priority to *demand management* and an enhanced role for public transport, walking and cycling. This is *critical* to key economic, social and environmental objectives in the plan. (my italics) The management of transport demand (traffic restraint) is seen as a necessity as well as a policy objective in its own right...It is both environmentally and economically unacceptable to meet all of the likely demand for individual mobility and access through the provision of additional road space, particularly in the urban areas."

Clause 4.3 of the Transport section of the Structure Plan states: "A progressive switch in the balance of this expenditure (capital and revenue expenditure projects) towards developing alternatives to the private car is envisaged over the next 20 years."

Clause 4.4 of the Transport section of the Structure Plan indicates the Council's strong intention to switch to spending money on demand management and provision for alternatives to private car use rather than road-building.

Policy Tran 6 of the Structure Plan states that 'Local plans should ensure that development proposals are consistent with, or include, measures designed to manage the demand for travel and to transfer journeys onto non-car modes.'

Policy Tran 8 of the Structure Plan states that 'Priorities for road schemes will be targeted on the Primary Route Network and determined with regard to the extent that they...complement measures designed to manage the demand for travel and to transfer journeys onto non-car modes...'

Clause 4.25 of the Transport section of the Structure Plan states: "Within urban areas transport strategies should be developed which focus on demand management and the increased use of walking, cycling and public transport."

The LTP Policy document states that District Local Plans must be in general conformity with the Cornwall Structure Plan.

LTP Detailed Strategy 3 states: "Managing demand for travel is a key issue to tackle if growth in car traffic is to be reduced...In all town study areas, the County Council will promote the best use of road space to engender less reliance on the car..."

The 'Challenge' section of the LTP states that many of the solutions (to Cornwall's transport problems) will need...most importantly, a change in public attitudes and behaviour to transport choice and use...

In the light of all these statements, the Kensey Link Road scheme should surely have been rejected out of hand years ago and no further time or money wasted on its consideration.

Much control over allocation of resources is now with the Council - a heavy responsibility but one accompanied by greater freedom and flexibility in the use of resources for the benefit of the county in the ways advocated by authorities at all levels.

LTP Detailed Strategy 3 states: "In respect of traffic management, the County Council's objectives are to minimise the environmental damage caused by transport...secure a reduction in road accident casualties...control road traffic growth generally within Cornwall...secure an increased share of travel for non-car modes (and) increase awareness of the consequences of the individual's travel decisions." *The Kensey Link Road is inconsistent with these objectives.* It would cause environmental damage in terms both of destruction of wildlife habitat and of vehicle exhaust pollution, move the accident statistics to a new location, encourage car use and discourage walking and cycling, the latter effect being illustrated in Figure 12 in the 'Challenge' section of the LTP (the Traffic Growth Circle).

4.1.1 Demand predictions

Two claims in the 'Challenge' document are highly questionable:

1. that an ageing population will increase pressure upon demand for travel by placing greater demands on essential services. I would expect the elderly to generate the *lowest* demand for travel because

- a) they are not making journeys to work or educational establishments,
- b) many live in care homes or hospital where most/many of their needs are provided on-site, *and*
- c) they are probably the least likely group to make single-occupancy journeys by private car.

2. the predicted increase in car ownership. As a large proportion of population growth comprises older people, a larger proportion may be unable to own or drive cars, due to poverty and/or disability. It is important at this point to state that car *ownership* levels do not correlate internationally with car *use*: many countries have higher car ownership levels than Britain but lower levels of car use, due largely to superior provision of public transport and prioritisation of pedestrians and cyclists.

Rather than continuing to simply accommodate existing and rising traffic levels, action needs to be taken, in line with the policies of the Structure and Local Transport Plans and the Road Traffic Reduction Acts, to **reduce** motor vehicle traffic. There are many ways to do this, and such reduction will make schemes such as the Kensey Link Road redundant.

According to the 'Integration' section of the LTP "the 'Demand Management and Modal Shift' section of the UK Climate Change Programme Consultation Paper (1998) is of particular relevance to the County Council's role as the Local Highway Authority. The central themes of the section seek reductions in travel demand...whilst encouraging the role for public transport, walking and cycling. Other initiatives relate to encouraging modal shift through travel awareness campaigns, developing 'Safer Routes to Schools' projects..."

4.1.2 How to reduce demand

The Government White Paper 'A New Deal for Transport' (1998) has the main aim of increasing personal choice by improving alternatives to the private car.

LTP Detailed Strategy 3 states: "Managing demand for travel is a key issue to tackle if growth in car traffic is to be reduced...Measures will therefore be put in place to influence behaviour, either by encouraging less reliance on the car, reducing journey length, the timing and routing of journeys, the choice of mode, or by promoting opportunities to avoid the journey altogether..."

The Draft Regional Transport Strategy referred to in the LTP Policy document cites 'encouraging travel by more sustainable means (particularly by walking and cycling)' as a way 'to reduce the impact of transport on the environment (which is threatened by growth in road traffic, noise and pollution)'.

LTP Detailed Strategy 1 states that with regard to road safety education, training and publicity (ETP), the council's specific objectives include raising public awareness and acceptance of road safety and sustainability issues...contributing to sustainable transport measures and influencing public opinion and attitudes towards reducing car usage, by heightening perception of the environmental implications of excessive car use combined with health and safety benefits...

Detailed Strategy 3 includes 'changing public attitudes to car use', 'traffic calming and restrictions in residential areas', 'increasing the attractiveness and availability of other modes', 'encouraging alternatives to travel' and 'reducing the need to travel' as measures to address congestion, pollution and noise.

Detailed Strategy 3 states: "...it is still possible to change people's attitudes toward car use and by doing so achieve a reduction in traffic volumes and the attendant levels of pollution, congestion, noise and delay." NB the reference to reduction in *volume*, not just in growth. As stated above, road-building *increases* overall traffic volumes.

The Structure Plan Transport section also states that travel awareness is about influencing travel behaviour to achieve a voluntary reduction in car use. This of course requires *enabling* people to travel by different means - people will not walk or cycle if motor traffic is too dominant, and people will not use public transport if provision is patchy or if its existence is not publicised (*see* Sections 4.1.2.1-4.1.2.6). The Structure Plan Transport section goes on to state: "In Cornwall, year-round traffic levels are rising...Increasing traffic levels cause pollution and congestion problems which threaten health, the environment and the economy of Cornwall. Travel awareness involves the effective promotion of sustainable transport initiatives to generate public understanding and support, showing that everyone can help in solving the problems of traffic growth..." Many people in the Launceston area do in fact want to do their bit, but are frustrated by the lack of provision for alternative travel modes.

The Government White Paper 'A New Deal for Transport' (1998) proposes that transport choices should support a better environment and hence quality of life.

A survey in the mid-90s found that 36% of people would use their cars less if public transport were adequate. The Kensey Link Road, by encouraging private motor vehicle use and discouraging walking and cycling, would curtail such choice, as illustrated in Figure 12 of the LTP 'Challenge' document (Traffic Growth Circle). The intimidatory effect of traffic leads to yet more people choosing to use cars rather than walking or cycling - a vicious cycle which can only be turned into a 'virtuous cycle' by starting to reverse (not just reduce) traffic growth by the many means available:

- Improved public transport
- Improved provision for pedestrians and cyclists
- Improved facilities in small communities (reducing need to travel)
- Teleworking (*see below*)
- Traffic restrictions
- Localisation of distribution of goods

In many ways the council has more scope than does national government to reduce traffic in its own region: for example fewer levels of bureaucracy, enabling swifter action to be taken. For example, PPG 13 Clauses 33 and 34 state: **"...ICT...is creating opportunities to reduce the need to travel. ICT is facilitating increased flexibility in working patterns, including more home working, which has the potential to reduce daily commuting to work and enable some journeys to take place outside the peak periods. It also has the potential to increase the distance between homes and places of work, resulting in less frequent, but longer, journeys that may make less use of public transport.**

"Local authorities in both urban and rural areas should be alert to the possibilities for harnessing the use of new technologies to encourage local employment opportunities which reduce the need to travel."

Figure 1 (below) illustrates the 'virtuous circle' which will be created by the implementation of international, national and local transport policies.

4.1.2.1 Improving public transport

The 'Appraisal' section of the LTP states: **"Public Transport Infrastructure will decline without investment, that could be followed by decline in passenger numbers and consequent decline in provision. The end result of this would be higher traffic growth."**

LTP Detailed Strategy 2 states: **"In establishing the (Strategic Public Transport) Network, the County Council's aim is to realise a quality and level of service which will allow public transport to be a real alternative to the private car...It is now widely recognised that buses will be central to any integrated public transport system and provide people with an alternative to the car....There is clearly potential to increase the number of vehicles which operate in the most rural areas of the County and transport initiatives are currently being explored by the County Council...Throughout the course of the LTP it is anticipated that...more strategic rural links will be introduced...The County Council is keen to work with operators to promote coach services as an integral part of the transport system using methods such as through-ticketing for use on local buses."**

LTP Detailed Strategy 4 states: **"Opportunities to encourage transfer of journeys to public transport will be maximised where possible."**

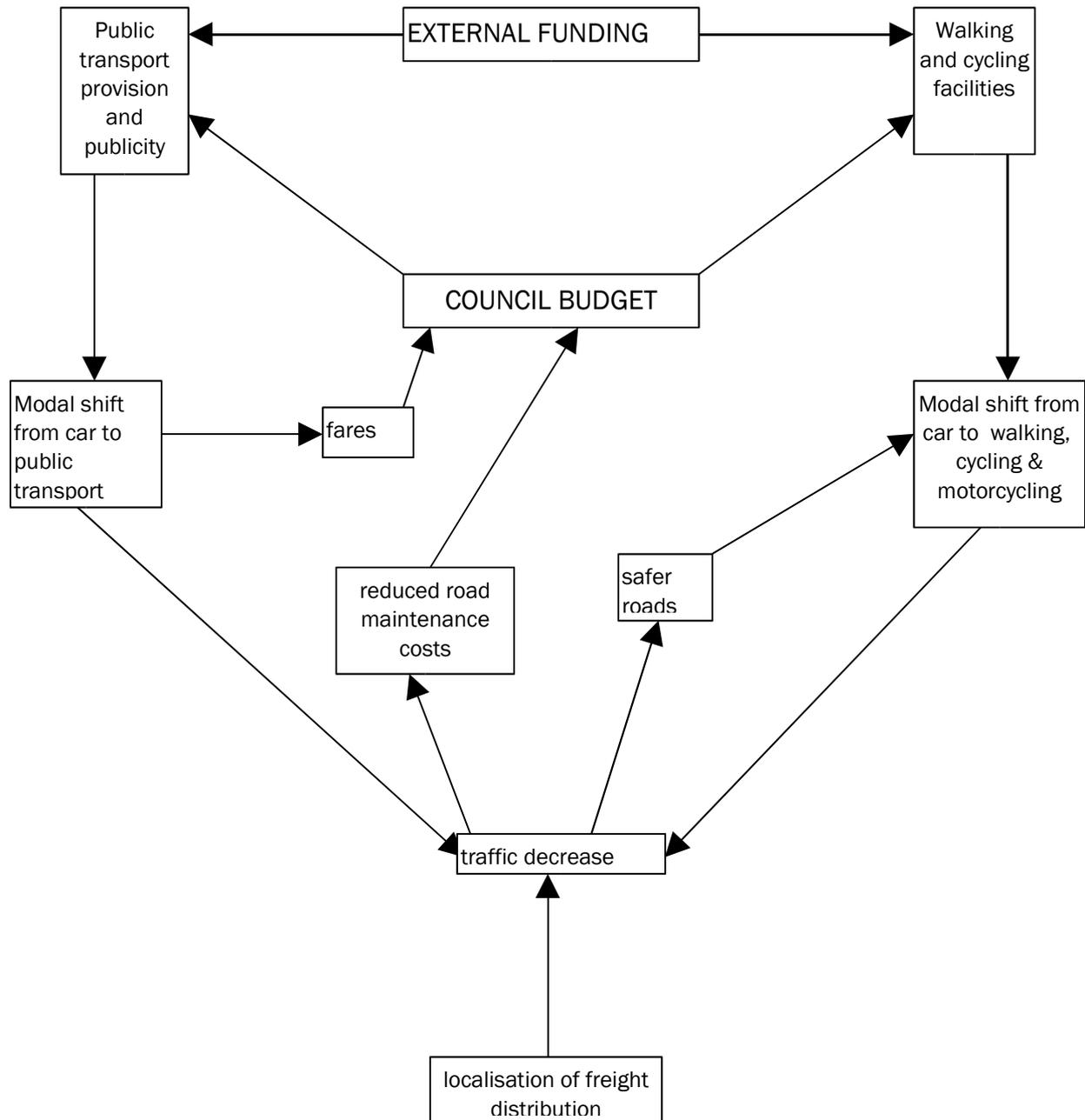


Figure 1 The 'Virtuous Circle' of sustainable transport policies

4.1.2.2 Publicising public transport

Clause 4.12 of the Transport section of the Structure Plan states: "The County Council will...seek to improve the quality of service through ...improvements to facilities for public transport users (e.g....display boards/screens giving journey and timing information which is seen as a key factor influencing choice of transport mode."

LTP Detailed Strategy 2 states that the availability of travel information is vital to all travellers. It further states that Cornwall County Council is committed to providing

high-quality public transport information (PTI) at both a local and regional level. The Government's Transport Bill promotes quality public transport. The Council document has an excessive emphasis on high-tech sources of information, including details such as the walking time to and from bus-stops. This appears to be a case of 'gilding the lily' - enhancing good existing services and information sources - when the Launceston area still lacks facilities of the most basic nature, i.e. regular and comprehensive services and low-tech information about them.

There are scarcely any bus stops for the routes to and from Launceston, giving the impression that there are no bus services. For example, I lived in Polyphant for several years before I realised that buses passed through it, even though there are two noticeboards at the main (unmarked) bus stopping point where timetables could be placed. Even after having learned of the existence of the bus route, I still did not know the *times* of the service or where I could find these out. I recently became tired of pointing out these omissions to a bus driver who continually complained about the lack of passengers boarding or alighting at Polyphant. His proposed solution was to stop taking the bus through the village rather than letting the villagers know about the service!

A simple, modest investment in bus stops and *in situ* timetables could significantly increase passenger numbers.

I find this lack of visible bus stops and on-site timetables extraordinary; it appears that people (including visitors) are expected to either know about bus services by word of mouth, to know that (and where) they can obtain timetable booklets, or to have supernatural powers.

Another useful spur to using buses would be local bus maps, both in portable form and at stops, showing routes in greater detail than the main Cornwall Public Transport map. I do not know whether there are any bus stops within reasonable walking distance of my home (say half a mile level walk) or how to find out.

The 'Investment' section of the LTP refers to the need to identify bus stops in Launceston. This is surely a cheap, relatively simple measure to implement.

4.1.2.3 The right *kinds* of public transport

Policy CT1 states: "The County Council will work in partnership with other authorities and organisations to promote the provision of appropriate forms of community transport to meet needs in Cornwall. Measures will include...promoting the development of new forms of provision, including demand-responsive services...to meet new challenges for...environmental sustainability."

Detailed Strategy 2 states that additional funding through the Government's Rural Bus Challenge Competition has provided opportunities to introduce new, innovative community transport solutions.

Has Launceston taken advantage of this and, if so, why is it not better publicised? *See* documents available online at

http://www.dft.gov.uk/pns/DisplayPN.cgi?pn_id=2003_0012

and

http://www.dft.gov.uk/stellent/groups/dft_localtrans/documents/pdf/dft_localtrans_pdf_504004.pdf

Detailed Strategy 2 of the LTP states that taxi-buses are being considered as part of the Rural Transport Partnerships. This is an excellent idea for the Launceston area; such schemes are proving successful in many parts of Britain with low population concentrations like that of Cornwall. Again, if such schemes already exist it is essential that they are well publicised. Newspaper articles are not enough, as many people in target groups may not buy newspapers regularly. Leaflets should be delivered through all doors in the areas covered, and council noticeboards should also carry the information.

Detailed Strategy 2 states: "The County Council's policies seek to ensure that alternatives are available as widely as possible...Single-occupant journeys would be targeted, particularly through employers, in order that the private car is being used in its most sustainable form. Drivers will also be encouraged to switch to public transport to congested town centres during the peak season." Taxi-buses might be an ideal solution for employers with a small workforce. Businesses concentrated in a small area, such as an industrial estate, could set up co-operative schemes for transporting employees to and from work. Has the Council offered incentives, information or other support towards this end?

4.1.2.4 Public transport for ALL

The Structure Plan Transport section Clause 4.6 states: "For those without a car, the national decline in public transport which has mirrored the growth in car journeys is a serious handicap. This group includes many pensioners, young, unemployed, sick or disabled people and - particularly during the daytime - mothers with young children."

The 'Integration' section of the LTP states: "The LTP initiatives for improvements in public and community transport will form an integral part in ensuring the effectiveness of wider social inclusion policies." It also refers to 'dial-a-ride' schemes. If these exist in Launceston, they are insufficiently publicised. If they do not exist, they should. Such schemes would be ideal for a small, hilly town.

According to Detailed Strategy 2, measures to promote the use of public transport services in accordance with integrated transport policy guidance include supporting the implementation of PTI2000 and ensuring that appropriate public transport information provision is available for people with disabilities. *How do you know who the disabled people are? Your own social services department tells me that they no longer register people as disabled.*

4.1.2.5 Fares

Detailed Strategy 2 of the LTP states: "In an attempt to reduce social exclusion amongst elderly and disabled persons the Government is legislating for the introduction of a minimum standard concessionary fares scheme."

When I enquired about concessionary fares I found that they were only available for people in a narrow range of categories which did not include myself, although I am in receipt of Incapacity Benefit and Income Support and have a specific condition which reduces my mobility.

Detailed Strategy 1 states that the County Council provides free transport to school for all pupils who qualify under national guidelines. Perhaps there is scope for reducing this radius if it could reduce the number of car journeys and thus cut congestion at peak times. As illustrated in Figure 1, the replacement of car journeys with bus journeys can reduce wear and tear on roads, so can be cost-effective if looked at in an integrated way.

4.1.2.6 Sustainable tourism

Appendix C of the LTP states that the wider policy objectives for the county include assisting sustainable tourism objectives.

I was told at the Launceston Information Office that there were *no* brochures promoting public-transport-based tourism in Cornwall.

What is being done in the Launceston area to encourage people to use public transport? Anything?

4.1.3 Facilitating walking and cycling

Clause 4.23 of the Transport section of the Structure Plan cites National Travel Survey data from 1991/3 showing that 72% of UK journeys are below 5 miles in length, whilst 46% are less than 2 miles in length, and that 'these trip patterns offer strong potential for increased levels of cycling and walking.'

The 'Investment' section of the LTP cites measures required to 'encourage more pedestrian, cyclist and public transport journeys' in Launceston.

The Draft Regional Transport Strategy referred to in the Policy document has six key objectives, including...encouraging travel by more sustainable means (particularly by walking and cycling) and the *safe* use of the Regional transport network (my italics).

4.1.3.1 Pity the poor Launceston pedestrian

PPG 13 Clause 75 states: "Local authorities should use their planning and transport powers to give greater priority to walking..."

Detailed Strategy 2 of the LTP states : "A hierarchy of road users has been decided by the County Council taking into account the results of the public consultation...The majority of the respondents to the consultation exercise thought that pedestrians ought to take top priority when considering traffic management and land use planning."

Detailed Strategy 2 cites policy W2: "The County Council will work closely with district councils and other authorities to ensure that transport strategies enhance walking facilities."

The Strategy document also highlights the need to develop strategies for walking...within an integrated transport strategy. The only such strategies which I have seen in Launceston in recent years have been the partial pedestrianisation of the town centre and the welcome construction of a short foot and cycle path from Ridgegrove Hill to Newport Industrial Estate. Unfortunately, to access areas to the west of the industrial estate one has to take one's life in one's hands due to the lack of a pedestrian crossing in St Thomas Road. Where is the integration here?

Cornwall County Council's policy W3 states: "Measures (to deliver traffic management and transport infrastructure improvements which promote walking as an alternative means of travel and for pleasure) will include improving pedestrian safety by giving high priority to pedestrians at the design stage and maximising provision for pedestrians; adopting best practice in pedestrian-friendly design...upgrading and

maintaining infrastructure to standards required for pedestrian use; reducing intimidation from motor vehicle traffic..."

Many people have chosen to live in Monks Park Cottages and Ridgegrove Hill north for the peace, quiet, safety and pleasant natural environment combined with accessibility on foot to the town centre. The recently-constructed foot and cycle path has further improved accessibility for non-car-using residents of this area, giving access to the amenities on Newport Industrial Estate and the north-western part of Launceston. Unfortunately it keeps becoming worn and rutted by water and this is only remedied infrequently - a different surface may be required. It is also unlit. It would be intimidating for pedestrians using the path to have to walk alongside a busy road - as the Kensey Link Road would be - and for walkers north of the road to access the path if Option 2 were implemented.

Bizarrely, an alternative east-west foot/cycle path has been proposed to run beside the River Kensey - *on its floodplain*. This would be frequently unusable due to flooding and erosion.

Detailed Strategy 2 of the LTP states that measures to promote walking through land use and development control policies will include ensuring that new developments do not sever existing pedestrian links.

The Kensey Link Road would split the Kensey Valley housing estate in two, creating an obstacle to people wanting to visit each other on opposite sides of the estate. Option 2 would sever the link between the northern and southern sections of Ridgegrove Hill - a road which has long been used by children walking to and from school and other resident and visiting pedestrians, due to its quiet and safe nature. As stated earlier, Ridgegrove Hill is part of the Two Castles Trail.

Having limited mobility, I can still manage to walk to the town centre and Newport, but Option 2 for the link road would make this extremely difficult if there were no pedestrian crossing, leaving me dependent on taxis, which I cannot afford. If I were forced to walk further, or have to negotiate additional slopes or steps, I might be unable to complete the journey. This may be incompatible with the Disability Discrimination Act which makes it unlawful to discriminate against disabled persons on a range of issues, including travel. The Act states: **"Where a physical feature makes it impossible or unreasonably difficult to make use of a service offered to the public, service providers will have to take measures, where reasonable, to:**

- **Remove the feature, or**
- **Alter it so that it no longer has that effect, or**
- **Provide a reasonable means of avoiding the feature, or**
- **Provide a reasonable alternative method of making the service available to disabled people."**

Either option for the road would cost me an additional £6-8 per week in taxi fares if my paths to the town centre and Newport were obstructed during construction, and I would claim reimbursement of this from the council.

Clause 77 of PPG 13 states: "Local authorities, as part of their local walking strategy, should also promote walking through measures such as: provision of...improved lighting; pedestrian-friendly road crossings which give pedestrians greater priority at traffic signals and avoid long detours and waiting times, indirect footbridges or underpasses..."

The 'Investment' section of the LTP refers to the need to *improve* pedestrian crossing facilities in Launceston (my italics).

As stated above, the path from Ridgegrove Hill to Newport has no lighting *at all*. Pedestrian crossings are almost non-existent in Launceston, and one which existed at Newport has been **removed**, making it dangerous and frightening to access the west side of town (including Newport Post Office) from Newport Industrial Estate and the footpath to Ridgegrove Hill, especially for parents with young children. Walkers have to glance hurriedly at three sets of traffic lights in order to identify the few seconds during which they can cross between the movement of these three different traffic streams, while hoping that all drivers comply with the lights. This industrial estate should be a convenient on-foot everyday shopping location for residents west of St Thomas Road - featuring as it does a Co-op store and large pet shop - if it were safe to cross St Thomas Road, but the lack of a safe crossing-point leads to people using cars. Most will probably travel instead to Tesco once they have been forced to make this choice of travel mode. The link road scheme would lead to tailbacks in St Thomas Road when traffic is halted on Newport Industrial Estate by articulated lorries using the entire width of the carriageway to access commercial units (a frequent event) making crossing by pedestrians even more difficult.

Detailed Strategy 2 of the LTP lists the objectives of 'Cornwall's Walking Strategy to increase opportunities, choice, awareness and enjoyment of walking as a means of access' as including the improvement of pedestrian safety, the promotion and *maximisation* of walking as a means of access, the improvement of opportunities for walking for leisure and the promotion of walking culturally and as an alternative to the car (my italics).

East of the Co-op on Newport Industrial Estate there are dog excreta on the pavement every few feet, plus frequent pavement parking by all types of vehicle, and brambles and thorn bushes overgrow the pavement near the eastern end, all forcing pedestrians to walk in the road. These contribute to the unpleasantness of walking in Launceston and thus to switches to private car transport for those who can afford it.

Detailed Strategy 2 states: "The County Council is particularly keen to ensure that pavement use is restricted to pedestrians only." I have given up reporting pavement parking on Newport Industrial Estate to the police as they have given the impression that they are powerless to investigate or take action. If the road were to become a link road it would become even more dangerous for pedestrians to use the road to avoid pavement-parked vehicles. May I request, however, that councils not 'solve' such problems by placing bollards on the pavement in a way which reduces the pavement width by such an extent that the 'solution' itself prevents its use by wheelchair users or people using other disability vehicles or aids, those using shopping trolleys, and parents with pushchairs, prams and baby-buggies. This flawed 'solution' makes access to the Launceston Market House Arcade for such people from the western side fairly perilous.

Cornwall County Council policy W5 states: "The County Council will support employer initiatives which encourage walking." Is anything being done to this end?

4.1.3.2 Catering for cyclists

Clause 4.22 of the Transport section of the Cornwall Structure Plan states: "...there is considerable potential to increase levels of cycle use. Switzerland has more hills and Sweden has colder winters and yet the proportion of trips made by bicycle in those countries is five times as great as that in the United Kingdom."

Cornwall County Council policy C3 states that measures by which District Councils and other authorities will be helped by the County Council to ensure that Town Strategies enhance cycling facilities will include adopting cycle parking design

standards to ensure that cycle parking facilities are convenient, accessible and secure. In Launceston such facilities do not even appear to *exist*, much less to be convenient, accessible and secure.

Policy C1: "The County Council will seek to promote cycling through land use, and its development control policies. Measures will include...ensuring appropriate provision to encourage cycle use with new development whilst maintaining existing access..."

Turning the residential road through the Kensey Valley housing estate into a relief road would impede access by cyclists (including children) from one side of the estate to the other and from the northern side of the estate to the foot and cycle path to Ridgegrove Hill and beyond. Option 2 would also impede access between the northern and southern sections of Ridgegrove Hill and from the northern section to the foot and cycle path and thence to the western side of Launceston.

LTP Detailed Strategy 2 states: "In considering the development of cycling networks and facilities the following factors will be taken into account, within the constraints that exist: safety...coherence...direct...comfort...attractiveness."

The cycle 'network' shown in the 1997 'Transport Strategy for Launceston' leaflet is highly discontinuous, with many sections coming to a dead-end. As stated in the previous section, the 'riverside walkway'/cycle path planned to run alongside the River Kensey is on the river's floodplain, so will be prone to flooding and erosion. Did no one consult the Environment Agency's floodplain map or seek local knowledge?

The foot and cycle path from Newport to Ridgegrove Hill suffers from water erosion (apparently from rain, natural springs and/or field-drain outlets), again suggesting that those who decided on the route had not taken local conditions into account.

Policy C2: "The County Council will work *closely* with District Councils and other authorities to ensure that Town Strategies *enhance* cycling facilities...high priority towards cycling as a means of access within strategies...reducing the dominance of motor traffic in residential and other areas suitable for cycling." (my italics) Policy C3: **"The County Council will seek to deliver traffic management and transport infrastructure improvements which promote cycling as an alternative means of travel...Measures will include: improving cycle safety on the existing highway...introducing...schemes which heighten the profile, and encourage more cycle use."**

Clause 66 of PPG 13 states: "Well designed traffic management measures can contribute to planning objectives in a number of ways, including...promoting safe...cycling...*across the whole journey.*" (my italics)

Clause 80 of PPG 13 states: "Local authorities, as part of their local transport plan strategy, should also promote cycling through measures such as: reducing traffic volumes on particular routes, including where relevant, restricting or diverting heavy goods vehicles..."

How is directing an increased volume of through-traffic along the mainly-residential Tavistock Road, which has been designated an on-road cycle route, going to **'reduce the dominance of motor traffic in residential and other areas suitable for cycling, deliver traffic management and transport infrastructure improvements which promote cycling, improve cycling safety on the existing highway and encourage more cycle use'**? How is it consistent with **'safe...cycling...across the whole journey'**?

Cornwall County Council policy C4 states: "The County Council will support education, training and publicity, as a means of promoting cycling...Measures will include...publicity and media campaigns to promote cycle safety and raise drivers' awareness." Is this being done?

Cornwall County Council policy C5 states: "The County Council will support employer initiatives which encourage cycling." Has any such action been taken?

4.1.4 Countering the Traffic Growth Circle

"The LTP sets out strategies which emphasise road safety, improving travel choices, encouraging more use of public transport, cycling and walking and also new and innovative ways of engaging the public, including business and transport operators to help deliver the 'New Deal' for Transport." ('Introduction' section of LTP)

LTP Detailed Strategy 1 states: "Reducing the dominance of the car in journeys to school is an objective of the County Council...the school run can account for up to 20% of traffic at morning peak times in urban areas." The 'Integration' section of the LTP states: "Busy roads can sever communities and the increasing number and high speed of vehicles can make pedestrian and cycle movements difficult or even dangerous."

Converting the road through the new Kensey Valley estate to a relief road would divide it into two sections, so would **sever communities, increase the number (and speed**, at least with regard to 'boy racers' - *see* section 3.4.1) **of vehicles** and discourage parents from allowing their children to walk or cycle to school, particularly those living on the northern side of the road. Thus the Kensey Link Road threatens to *increase* the school run by private car, contrary to LTP guidelines and aims.

Detailed Strategy 1 also states that its Child Safety Audit includes the development of safer routes for children, an audit of safe crossing points for children and speed management with regard to children.

Option 2 would *destroy* the relative safety of Ridgeway Hill for many children by allowing heavy traffic to use the road. Ridgeway Hill is in fact little-known, even to Launceston residents, and it might be used still more as a safe route to school if it were publicised as such. This need not be contraindicated by the flooding which sometimes occurs at Ridgeway Bridge and Ridgeway Mill, which could be dealt with via simple low-tech means such as temporary raised wooden walkways or permanent elevated footbridges.

The effects of the Traffic Growth Circle are starkly evident in Launceston. The lack of safe crossing points in Launceston is probably a major reason for parents driving children to school.

The 'Integration' section of the LTP states: "The transport habits instilled in children may stay with them throughout their lifetimes...Children who walk or cycle to school are likely to have health benefits in later life..."

Detailed Strategy 1 states that road accidents are the leading cause of death for school-age children, that the increasing transport of children to school by car may well be reducing children's opportunities to gain adequate road safety skills, which would serve them well in later years, and that it could also be impacting on their health.

I recently witnessed two girls (young teenagers) sauntering part-way across the road on Newport Industrial Estate immediately in front of a car, then standing in front of the car (forcing it to stop) whilst chatting to someone on the opposite side of the road - an adult who

did not point out their folly or urge them to get onto the pavement. They appeared to be completely oblivious to the car. Perhaps walking is a rare experience for them, and perhaps this is largely due to the difficulty of walking safely in Launceston.

The 'Integration' section of the LTP states: "Through its land use and transport policies and programmes, the County Council is well-placed to make a valuable contribution towards the Government's objectives for health improvements and to assist in meeting national health and environmental targets. In relation to the Government's health objectives, the key areas over which the LTP will have the most influence and greatest impact is in relation to accident reduction, air and noise pollution, access to facilities and services (social exclusion) and general health (through measures to encourage exercise, i.e. walking and cycling)."

Detailed Strategy 2 of the LTP states: "Important health benefits can be gained through walking and cycling, especially where excessive car use has resulted in the reduction of these life-enhancing activities...Local studies have identified that walking and cycling can contribute to improving quality of life in the community. Given that 72% of trips by all modes are less than 5 miles, and half are less than 2 miles, with the appropriate facilities and conditions walking and cycling can prove to be viable alternatives to motorised transport."

Clause 4.24 of the Transport section of the Structure Plan states: "The provision of appropriate routes for walking and cycling is an essential component of a sustainable transport strategy. These should provide links between residential areas and desired work, educational and shopping destinations."

Detailed Strategy 2 states: "In order that the potential for walking, cycling and equestrianism can be maximised, schemes are considered against...improvements in pedestrian, cycle...safety; standards of coherence, directness, attractiveness and comfort, routes serving utility trips for pedestrians and cyclists e.g. to schools, residential areas..."

The opportunity exists to create a level, manageable walking and cycling route all the way from Kensey Hill to the western side of Launceston, including shops in Newport and St Stephens and St Joseph's schools. People will also be able to walk or cycle from the path down Ridgegrove Hill to the River Kensey, Ridgegrove Mill and Ridgegrove Lane - another quiet road also used by horse-riders, as is Ridgegrove Hill. These largely unspoilt country walks would be retained by strategies **'taking into account the special characteristics of the area'** as recommended in the 'Integration' document: the area has a peaceful, rural character which would be destroyed by the Kensey Link Road through pollution of the air, drowning out of the birdsong and by creating a risk of road traffic accidents. The change would represent a serious disincentive to walking and cycling and would be inconsistent with **'national targets identified through the Road Traffic Reduction Act, National Cycling Strategy, National Road Safety Strategy and the National Air Quality Strategy'** as referred to in the Integration document.

The path - plus a crossing over St Thomas Road, a lack of dog excreta, properly trimmed vegetation and a lack of pavement-parking - would meet admirably all the criteria detailed in the extract from Detailed Strategy 2 above apart from the following shortcomings: the path appears to be inaccessible to wheelchairs - the entrances to the path being narrow - and there also appears to be insufficient width on the path itself to pass a wheelchair on foot or cycle. The industrial estate has a day centre for disabled people - some of whom may be wheelchair users. The path is also poorly maintained, becoming heavily rutted and muddy after rain, and it is unlit. *Why are these issues not being addressed?*

Planning Policy Guidance (PPG) 13 Clause 31.3 states: "Local authorities, developers and transport providers should work together to seek to meet the accessibility needs of disabled people in all developments by...ensuring developments, including transport infrastructure, are accessible to and usable by disabled people as...pedestrians - through decisions on location, design and layout¹."

For further advice see: **Guidance on the Use of Tactile Paving Surfaces (1999)**, and **Traffic Advisory Leaflet 5/95, Parking for Disabled People**, or contact the **DETR Mobility Unit** at fax **020 7944 6102** and e-mail: **mu@detr.gsi.gov.uk**

Opportunities to replace car use with walking, cycling and use of vehicles for the disabled are being missed.

Detailed Strategy 3 states that the degree of improvement for pedestrians, cyclists, public transport, reduction in traffic volumes and reduction in traffic speeds will be taken into account in prioritising measures to achieve the council's objectives.

The Kensey Link Road scheme will be seen to be redundant when these improvements have been made.

The 'Investment' section of the LTP also stresses the 'overarching aim...to provide safety benefits for *all* road users' (my emphasis).

So why is the Kensey Link Road scheme - a 'business as usual' proposal inconsistent with almost every aspect of the Council's own recommendations and inimical to safe, pleasant cycling and walking - still under consideration? Figure 1 illustrates how the Traffic Growth Circle can be replaced with a virtuous circle of traffic reduction.

4.1.5 Improving local facilities

Clause 76 of PPG 13 states "In preparing their development plans and in determining planning applications, local authorities should...promote and protect local day to day shops and services which are within easy walking distance of housing..."

The 'Challenge' section of the LTP states that many small communities lack basic services and are reliant on transport to access basic facilities. Appendix C of the LTP states that 48% of small communities have no access to a local shop.

The 'Integration' section of the LTP states: "...non car-owning residents of the rural areas are progressively disadvantaged. This is brought about not only by the reduction of public transport services but also by the concentration of shopping, education, employment and health facilities in urban areas and their withdrawal from country areas has added considerably to these problems...the rural transport strategies will attempt to redress this imbalance in conjunction with the other agencies responsible.

The problems also occur in towns. For example, the removal of the Launceston GP practice from the town centre has made it difficult or impossible to access on foot for most residents and workers.

As well as providing public transport, assisting communities to acquire and retain services such as local post offices, shops, pubs and schools will help to solve these problems and will reduce traffic as well as improving social cohesion in communities. But the trend toward centralisation appears to be proceeding unchecked. *Why?*

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4.1.6 Localisation of freight distribution

Much of the traffic currently using St Thomas Road comprises lorries - many large - and other commercial vehicles.

The Government White Paper 'A New Deal for Transport' (1998) promotes sustainable distribution.

Detailed Strategy 5 states that the Council's 'Freight Distribution Strategy' is 'nested in, and contributes to, an agenda for sustainability'.

It also states that the Government's overall objective for freight distribution is to help industry to develop sustainable systems and solutions which promote economic growth while reducing accidents, health risks, disturbance and environmental damage, and that the County Council supports these aspirations and has established a long-term vision for freight distribution which is consistent with the concept of sustainability.

The common modern interpretation of the word 'sustainability' is questionable to say the least. The word has been widely hijacked by many people to use as 'greenwash' for unsustainable projects and defined by little Green 'add-ons' which fail to counter the net damage caused by such schemes or to address the underlying causes of the existing problems. Others have probably accepted this bogus version of 'sustainability' through ignorance or complacency.

True sustainability requires rigorous minimisation of the use of non-renewable resources such as metals and petroleum-derived materials, which is rarely *seriously* addressed by mainstream legislators and regulators. To even *approach* genuine sustainability, localisation of distribution is essential, and this is not only attainable but also economically beneficial for regions which practise it. It keeps money within the region and helps the region to retain its own distinctive qualities, for example with regard to crafts, building materials and food. In the case of Cornwall, the reduction of traffic consequent on localisation of distribution will also contribute substantially to the retention of the environmental qualities which are the main component of the 'Vision for Cornwall' referred to elsewhere.

Cornwall is especially well-placed to reduce traffic by this means, as it is not en route to anywhere else: all traffic coming through Cornwall is traffic *for* Cornwall. The number and size of lorries travelling through Cornwall can be dramatically reduced if Cornwall authorities, businesses and institutions source materials from within the county wherever possible. No longer would fleets of large vehicles need to enter Cornwall from all parts of the country and even further afield. Being on the eastern fringe of the county, Launceston probably has more than its fair share of this damaging and unnecessary type of traffic, so that county-wide local-sourcing policies have the potential to dramatically reduce congestion and other adverse effects of road traffic in this town. Benefits in terms both of traffic reduction and of economic improvement are likely to be seen soon after the policy starts to be implemented.

Detailed Strategy 5 states that growth in freight is a factor of economic development within the county. This interpretation of economic development is based on GDP. GDP treats the rectification of environmental damage as a gain and thus fails to give appropriate credit to activities which *avoid* damaging the environment.

Growth in freight is not sustainable - full stop. Localisation of distribution will benefit local producers. This will provide more genuinely sustainable employment and thus help to stem the outward flow of young people accompanied by their replacement with wealthier incomers who push house prices beyond the reach of locals.

Detailed Strategy 5 refers to the development of 'e' logistical systems which are likely to have 'immense' implications for combating traffic growth. This needs to be taken into account when considering new road construction to accommodate traffic growth.

Detailed Strategy 5 states that the increase in average freight payloads has led to efficiencies being gained. This statement is flawed and misleading, as indeed is the concept of GDP which is cited in relation to it. Heavier vehicles cause more damage to roads and associated structures, which is *not* efficient.

Detailed Strategy 4 states that vehicles up to 41 tonnes gross weight and smaller vehicles with axle weights of up to 11.5 tonnes are now permitted onto our roads. It also states that many road structures in Cornwall still need strengthening, and that assessment alone for 2000/2001 had been allocated £376,000. Clearly a reduction in the number and size of lorries in Cornwall (by greater localisation of distribution) will slow the rate of deterioration and thus save money.

This leads on to the need to spend scarce resources on road maintenance rather than road-building.

4.2 The need to maintain existing roads

Appendix D of the Transport Section of the County Structure Plan commits to maintaining the existing highway network rather than new-build.

LTP Detailed Strategy 4 states: "The condition of the overall road network has deteriorated significantly over the last 10 years as pressure on funding has occurred...considerable investment is required to improve the principal road network to minimum structural, safety and serviceability standards."

Detailed Strategy 1 states that powered two-wheeler (PTW) riders are vulnerable to poorly-maintained roads and debris on roads. Detailed Strategy 2 states that there has been a 47% drop in the number of registered mopeds and motorcycles in Cornwall in ten years, contrary to the national trend.

It would appear that Cornwall is not 'PTW-friendly' and that there is considerable scope to increase the proportion of people travelling by this more environmentally-friendly (compared with cars) mode of transport. Directing funds to maintaining current roads rather than constructing new ones would contribute towards such a modal shift.

Reducing motor traffic via the strategies in the LTP (increasing cycling, walking and public transport use, reducing the need to travel and localising the distribution of goods) will reduce wear and tear on roads and the need, or perceived need, to build new roads. It will be cheaper than simply accommodating demands for more road space and will also improve health, safety, environment and social cohesion.

4.3 Social inclusion and accessibility for all

The LTP Executive Summary advocates the promotion of social inclusion by investing in an integrated transport system which is accessible to *all* (my italics).

The Kensey Link Road scheme is inconsistent with this and with the LTP's key social objective **'to improve accessibility between jobs, services and facilities by enabling**

choice for attractive alternatives to car travel'. It simply accommodates car use and freight transport in a way that would increase traffic, thus making the use of alternative transport modes more difficult, unpleasant and dangerous via the Traffic Growth Circle. It would increase the social exclusion of the 25% of people without cars.

Detailed Strategy 3 also states that the degree of improvement for local residents and social inclusion will be taken into account in prioritising measures to achieve the council's objectives.

The Kensey Link Road scheme would hamper such improvement by making walking and cycling more dangerous and unpleasant through increasing road traffic in residential areas and currently-quiet environments, by severing current walking and cycling routes and by diverting council resources desperately needed for the improvement of public and community transport and walking and cycling facilities.

The 5 overarching aims of the LTP include reduction of the adverse impact of transport, in order to promote health, protection and enhancement of the built and natural environment, to promote accessibility to work, facilities and services for *all* people, *especially those without a car* (my italics). The Kensey Link Road scheme would *increase* the adverse impact of transport, be inimical to the health and enhancement of the built and natural environment and reduce accessibility to work, facilities and services for people without a car.

Also *see* Section 4.1.2.4.

4.4 Energy-efficiency and sustainability

Appendix C of the LTP states: "If no action is taken, road traffic in Cornwall is predicted to increase by a further 32% to 62% in the period from 2000 to 2009..."

This is clearly unsustainable. It would discourage tourists and seriously damage the economy and the quality of life for residents. Urgent and concerted action must be taken to prevent it, and there must be absolutely *no* action taken which is likely to *increase* traffic. Road-building increases traffic.

Detailed Strategy 4 states: "The County Council has given a commitment to incorporate the concept of sustainable development into its transport policies."

The 'Integration' section of the LTP states: "Transport has a significant impact on air quality, accounting for 23% of carbon dioxide emissions, of which 87% comes from road traffic. The UK Climate Change Programme Consultation Paper (1998) sets out the Government's aspirations in reducing emissions."

"Energy consumption from road transport constitutes the fastest-growing source of CO₂ (the main greenhouse gas and cause of global warming) emissions." ('Challenge' section of the LTP)

Evidence has shown that accommodating the current demand for road traffic by building new roads will *increase* such emissions in the long term via increases in traffic, and probably also in the short term by discouraging walking and cycling and by diverting scarce monetary resources from the promotion and implementation of sustainable transport modes.

The Transport section of the Structure Plan refers to the need to reduce 'the emissions that damage both human health and the local and global environment.' Appendix D of

the Transport section of the Structure Plan makes a 'commitment to energy efficiency - reducing the contribution that transport makes to global climate change.'

Note that it does not commit to a mere reduction in growth of the contribution but an *absolute* reduction. This requires an absolute reduction in traffic. The development of greener power sources for vehicles will eventually reduce some of these adverse effects, but the change to such sources is very slow, and emissions must be reduced as a matter of urgency, *now*.

The Policy section of the LTP states that the Draft Regional Planning Guidance (which has presumably now been adopted) commits to developing the region in a sustainable way...It aims for protection of the environment and prudence in the use of resources.

The Kensey Link Road would not represent a prudent use of resources, monetary or physical (the latter including metals, aggregates, fossil fuels and other petroleum-derived materials). It would not be sustainable because it would encourage motor vehicle transport, partly directly and partly by discouraging walking and cycling (Traffic Growth Circle).

Clause 81 of PPG 13 states: "Local planning authorities should take a more pro-active approach towards the implementation of planning policies on transport...to deliver more sustainable transport solutions."

Clause 4.2 of the Structure Plan Transport section states: "A more energy-efficient and environmentally sustainable transport system for Cornwall will give greater priority to *demand management* and an enhanced role for public transport, walking and cycling..." (my italics) A key environmental objective cited in the Strategy section of the LTP is 'to make more efficient use of energy in terms of...the use of transport modes'.

The Kensey Link Road, by accommodating and encouraging energy-inefficient motor transport at the expense of walking and cycling, is inconsistent with the Structure Plan and LTP as well as with international and national protocols and guidelines.

Appendix C of the LTP states that the wider policy objectives for the county include assisting sustainable tourism objectives. What is the County Council doing to meet this objective? (also *see* Section 4.1.2.6)

4.5 Integration and coherence

The Executive Summary of the LTP states that 'the 5 overarching aims of the LTP include...promotion of the integration of all forms of transport and to reduce the need for travel...'

The Strategy document states that 'strategies should support the economic, environmental and social objectives of Cornwall, thus contributing to sustainability and integration.'

According to the Executive Summary, the LTP "provides the basis for developing a coherent set of strategic-led transport policies which will meet economic, social and environmental needs in a way which provides added value and a more effective and efficient use of resources." I could not agree more (with only minor reservations which are detailed in this review), and cannot conceive how anyone could ever have imagined that the Kensey Link Road complied with *any* such criteria. Where is the coherence in the Kensey Link Road scheme? For example, the Tavistock Road section of the route into which the Kensey Link Road would feed has also been designated as an on-road cycle route (*see* Section 4.1.3.2). This represents a total lack of integration and coherence.

The Kensey Link Road just moves an existing problem to a new location, destroying wildlife habitat as it does so (including a piece of rare wet woodland), in an attempt to accommodate the unsustainable practices of excessive freight transportation and excessive car use.

LTP Detailed Strategy 3 states: "Managing demand for travel...must be integrated with other policies and improvements to other transport modes, and with strategies to influence the way in which people travel and goods are carried."

The aim to '**reduce the peripherality of the County' (Detailed Strategy 5)** may conflict both with localisation of distribution and with the County Council's own advocacy for **Cornwall as a 'special place'** in the '**Vision for Cornwall'** referred to in the Strategy document. This is another example of a lack of integration between policies and strategies.

The (Draft) Regional Planning Guidance "has a key role in achieving the integration of land use planning and transport policy." (LTP Policy document) Putting a relief road through a residential estate is an example of a complete *lack* of such integration, notwithstanding the fact that a section of the road has - inexplicably - been viewed as a piece of planning gain from the building of the estate.

Detailed Strategy 3 states: "The true costs of travel are often not considered, for example...the environmental impact...The strategy must seek to raise awareness of these issues." It is hard to avoid the impression that the council itself lacks such awareness, at least when it comes to *implementing* policy in the Launceston area.

The 'Strategy' section of the Local Transport Plan states that the LTP must be developed within the context of a clear, long-term vision for Cornwall and wider economic, social and environmental objectives, and that 'without this vision for the future, there is a danger of merely planning in the short term.'

The Kensey Link Road is a stark example of short-termism. It ignores the future traffic-reducing effects of the County Council's own policies to promote public transport, walking and cycling, plus localisation of distribution, teleworking and enhancement of local facilities.

According to the LTP Executive Summary, "in developing strategy for the future of transport provision within Cornwall it is important that international, national, regional and local policy guidance is taken fully into account."

The Strategy document of the LTP states that the development of the LTP 'has provided the County Council with an opportunity to re-evaluate its strategies to ensure that they are in accordance with developing national and regional policy,' and that 'a fundamental review has highlighted that the scope of existing strategies needs to be broadened to take on board wider issues to achieve a more integrated approach.'

The Kensey Link Road scheme does not appear to have any broad integrative characteristics, and it contravenes almost every aspect of international, national, regional and local transport policy.

5. Conclusion

Cornwall's Local Transport Plan is a thoughtful, rational set of policies for reducing the adverse impact of road traffic on the qualities which make Cornwall a highly desirable place to live and to visit. Unfortunately and inexplicably, some schemes which are totally at odds with the plan are still under consideration.

The Kensey Link Road scheme is environmentally destructive, detrimental to health, safety and social cohesion, wasteful of resources and unnecessary.

It would destroy wildlife habitat including wet woodland which is rare in Cornwall, and would threaten wildlife in its vicinity. It would threaten an ancient mill. It would transfer noise, accidents and pollution from a mixed commercial and residential area to completely residential areas and quiet rural areas. It would perpetuate and exacerbate the Traffic Growth Circle in the Launceston area, making walking and cycling more difficult, dangerous, unhealthy and unpleasant. It would increase overall traffic levels and thus exacerbate global warming. Any benefits from constructing this road would be greatly outweighed by this multitude of serious adverse effects.

Congestion and accidents, cited in arguments for the road are, variously, exaggerated or a consequence of failure to direct traffic appropriately, to enforce parking restrictions, to improve junctions, to implement the County Council's own policies for reducing overall traffic levels, to localise freight distribution and to reverse the centralisation of facilities.

If the scheme were to go ahead, one would have to conclude that the Road Traffic Reduction Acts, Cornwall County Structure Plan and Local Transport Plan are nothing more than fine words, not to be taken seriously, much less implemented. If the Council is really serious about its stated objectives, it will throw out plans for new roads such as the Kensey Link Road and instead implement its own policies, which will transform the Traffic Growth Circle into the 'virtuous circle' shown in Figure 1. This will, in the council's own words, provide "**accessibility to work, facilities and services for *all* people, especially those *without a car.***"

If local councils implement the policies referred to above and pursue the transport model exemplified in Transport 2000's report 'Rural Transport Futures' (details at http://www.transport2000.org.uk/library/RuralTransportFutures_summary.pdf), Cornwall will become a place where the transport needs of everyone are met and its built, natural and semi-natural environments will become safe and pleasant again.

Vivien Pomfrey, 6th January 2004