

TRAFFIC & HIGHWAY SAFETY — DETAILED PUBLIC OBJECTION

Planning Application PA24/08685

Submitted to Cornwall Council during re-consultation — 9 October 2025

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About this document

The objection reproduced below has been downloaded from Cornwall Council's planning portal.

This detailed objection was submitted to Cornwall Council on 9 October 2025 in response to the applicant's Transportation Advisory Note (TAN) during the public re-consultation on PA24/08685. The TAN submitted at re-consultation was identical to the TAN included with the original application. This objection examines its traffic data, projected vehicle movements, proposed HGV routes, site access and highway-safety evidence.

OBJECTION TO TRANSPORTATION ADVISORY NOTE (TAN) **– PA24/08685**

This objection is submitted as part of the current public re-consultation. It responds directly to the applicant's Transportation Advisory Note (TAN), which was resubmitted unchanged in September 2025, despite forming part of the earlier planning submission (posted on the portal 30 December 2024) and the fact that many of the earlier objections specifically highlighted fundamental flaws in the numerical evidence it presents.

Although the applicant's Transportation Advisory Note (TAN) forms a key part of their re-submitted evidence bundle, it **relies almost entirely on recycled and outdated datasets** and steadfastly ignores objections already raised by members of the public and local stakeholders. Yet here it is again, unchanged, with no apparent effort to correct or even acknowledge those concerns - and still it fails to provide a credible or site-specific assessment of traffic and highway safety impacts.

Critically, **no independent traffic survey has been undertaken for Roseworthy**. Instead, the TAN relies almost entirely on recycled and outdated datasets. It is supported by three appendices:

- **Appendix A**, which presents “average load figures” based on 2018/2019 data.

- **Appendix B**, which derives projected vehicle trips by back-calculating from Appendix A.
- **Appendix C**, a selective mapping exercise which omits critical safety constraints on the approach from Roseworthy.

This structure means the credibility of Appendices B and C rests entirely on the soundness of Appendix A. If A is outdated or inappropriate, then the calculations in B, and the assumptions in C, are fatally undermined.

Despite this, the applicant continues to **use obsolete Splattenridden site data** to infer the likely impact of transferring their commercial green waste operations to **Roseworthy**. Unsurprisingly, this document then presents its conclusions as a *fait accompli* - a supposedly factual and positive outcome that, in reality, **obscures and minimises the truly huge scale of both immediate and future transport impacts**.

Below, I analyse the data presented by the applicant themselves to show clearly **why and where the resubmitted TAN and its three appendices are flawed from the outset**. When extrapolated into the near and medium future, the **applicant's own figures reveal unsafe, unsuitable, and unrealistic outcomes**. These negative consequences are systematically ignored in the TAN's narrative, demonstrating that **the report's conclusions cannot be relied upon as credible evidence** in support of this application.

These systemic faults begin at the very source - **Appendix A** - whose outdated and generic "average load" data underpins the applicant's entire transport case. **Presented as objective evidence, it in fact relies on obsolete averages and circular assumptions which then cascade through Appendices B and C, distorting every subsequent conclusion**. Once these weaknesses are exposed, the credibility of the whole TAN unravels.

What follows shows that **both Appendix A and Appendix B are fundamentally unsound as evidence: they use six-year-old averages from a different site, fail to reflect the applicant's own recent throughput growth, and obscure the true scale of traffic that the Roseworthy site would generate. Appendix C perpetuates the same deficiencies through selective mapping and omission of critical safety constraints**.

We consider Appendix A first, as it forms the baseline for all subsequent assumptions.

NOTE: THE FOLLOWING EXCLUDES 13000 TONNES PER ANNUM OF WOOD AND PLASTICS ASSOCIATED WITH THE SITE (THESE NUMBERS ARE OMITTED AND UNCONSIDERED BY THE TAN)

APPENDIX A – AVERAGE LOAD FIGURES

As stated, the applicant's Appendix A forms the foundation for all subsequent transport calculations.

It presents “average load figures” for vehicles delivering green waste, derived from Household Waste Recycling Centres (HWRCs), Town Councils, and the applicant’s existing Splattenridden site.

While presented as objective evidence, **Appendix A** in fact **relies on obsolete averages and circular assumptions that cascade through Appendices B and C, distorting every later conclusion.**

While presented by the applicant as an objective dataset, Appendix A is **fundamentally unsound as a basis for decision-making:**

- **OUTDATED BASELINE** – The figures are based on 2018/2019 averages from the applicant’s existing Splattenridden operations. The applicant’s own material confirms that **overall throughput across its business has since increased by approximately ~32 % (from ~380,000 tonnes in 2019 to over 500,000 tonnes today), equivalent to an annualised growth rate of ~5.2 %.** This aligns with national data reported by **Defra** and **WRAP**, which attribute similar growth to population expansion, improved recycling capture, and **local-authority obligations to move waste up the waste hierarchy.**

While green-waste tonnages can fluctuate year-to-year depending on weather and collection policies, a **five-year rolling average of around 5 % growth per annum is realistic for Cornwall’s waste sector.** The applicant omitting to reflect even this documented trend by **continuing to use 2018/2019 static data produces an artificially low baseline that understates current and future traffic by a wide margin.**

Treating **six-year-old figures as current creates a false baseline** that materially misrepresents present conditions. This data is neither qualified nor independently verified anywhere else in the submission - it exists only in this single spreadsheet - and **cannot credibly support the conclusions drawn from it.**

On that basis, applying the applicant’s own observed growth rate of ~5.2 % per year to its 2018/19 vehicle totals produces the traffic trajectory later set out in **Appendix B.** That **projection starkly exposes how the TAN’s static baseline masks the real and escalating transport impacts** that Roseworthy would face if this facility were approved.

This projection must also be understood in the wider policy context that drives Cornwall’s waste-management capacity and vehicle flows.

CORNWALL COUNCIL-DRIVEN GROWTH IMPERATIVE

The applicant’s assumption of static traffic also conflicts directly with Cornwall

Council's own *Resources & Waste Strategy*, which commits the authority to achieving **65% household recycling and composting by 2035** - up from **34.1 % in 2022/23**. Meeting that target necessarily requires a major expansion of organic-waste capture, including green and food waste. Cornwall's new kerbside collections, HWRC upgrades and **mandatory separation of garden waste will all increase the tonnage of material requiring haulage and processing**.

National and local data indicate compound growth of roughly **5 % per annum in green-waste arisings** - a rate corroborated by the Green Waste Company's own records (380,000 t → 500,000 t between 2019 and 2024). This policy-driven trajectory makes it **inevitable that both tonnage and vehicle movements to any council-contracted composting site will continue to rise year-on-year**. The TAN's reliance on fixed 2018/19 figures therefore understates not only current conditions (2025) but also the foreseeable and anticipated increase mandated by the Council's own strategy.

- **NOT SITE-SPECIFIC** – All underlying data originates from the applicant's Splattenridden facility and a selection of Household Waste Recycling Centres (HWRCs). However, the Splattenridden location itself bears no resemblance to the proposed Roseworthy site. **Splattenridden is low-lying, enclosed, and screened by mature vegetation, whereas Roseworthy occupies an exposed agricultural hilltop, reached only by narrow, hilly rural roads with no pavements, lighting, or refuges, and with residential properties directly fronting or on the HGV route.**

Basing highway assumptions for Roseworthy on conditions at Splattenridden is therefore methodologically unsound and produces conclusions that have no site-specific validity. It obscures the very factors - gradient, geometry, and receptor proximity - that are most critical to highway safety in this location.

- **AVERAGES DISGUISE PEAKS** – By relying only on annual averages, **Appendix A fails to reveal the large seasonal and daily surges that characterise green-waste operations.**

In practice, **HGV movements are significantly higher during peak periods** - spring and summer growth seasons, autumn leaf-fall, and post-storm clearances - when deliveries and collections intensify across Cornwall. **These peaks are the moments that drive real highway-safety risk**, yet Appendix A flattens them into a notional "average year," thus masking the very conditions under which accidents are most likely.

At a time when the applicant's own throughput has already increased by ~32 %, the use of **static annual means materially understates current and future traffic pressures**.

- **CIRCULAR JUSTIFICATION** – The consultant **uses Appendix A's outdated averages to back-calculate trip numbers in Appendix B**, meaning the second appendix is not an independent dataset at all - merely a **derivative of the first**.

Councillors and the public are therefore being presented with **estimates built on estimates**, rather than any verifiable traffic survey data.

This circular logic is **presented as numerical precision**, yet it compounds error: every flaw in Appendix A automatically contaminates Appendix B's results, giving a false impression of scientific reliability where none exists.

- **POLICY NON-COMPLIANCE – Cornwall Local Plan Policy 27** requires **robust, site-specific evidence demonstrating that development can achieve safe and suitable access for all users**. The Transport Advisory Note fails this basic policy test. Its **inputs are recycled from historic datasets unrelated to Roseworthy's** location, terrain, or road geometry, and no independent traffic survey has been undertaken.

By presenting unverified, desk-based averages as evidence of highway safety, the applicant's submission falls well below **the evidential standard required** under **Policy 27** and the **NPPF**, which both **demand that cumulative impacts be assessed realistically and refused where they are severe**.

It therefore CANNOT meet this test.

WHY APPENDIX A IS UNSOUND

Appendix A is not an independent dataset. It is a recycled collection of historic averages that understate real vehicle numbers and ignores the specific operating conditions at Roseworthy. Its apparent precision disguises three fundamental flaws:

1. The figures are frozen in time at 2018/19 levels.
2. They are irrelevant to Roseworthy, being drawn from Splattenridden conditions.
3. They are then used to generate Appendix B, meaning all downstream transport evidence inherits the same errors.

IMPLICATIONS

Because Appendix A underpins Appendix B, any weaknesses here are magnified later. Councillors are effectively being asked to accept that:

- Roseworthy traffic can be assessed using six-year-old averages from another site.
- Annualised averages can stand in for real-world seasonal and daily peaks.
- Derived estimates can substitute for independent traffic surveys.

This is not credible. On the applicant's own figures, throughput has already grown by nearly a third since 2019.

THE TRUE SCALE OF VEHICLE MOVEMENTS IS ALREADY FAR HIGHER THAN APPENDIX A IMPLIES, AND APPENDIX B MERELY COMPOUNDS THAT ERROR.

SUMMARY

Appendix A fails as a credible foundation for any transport evidence. It is outdated, non-site-specific, circular, and inconsistent with Cornwall Local Plan Policy 27. By treating six-year-old Splattenridden data as current, the applicant has produced a false baseline that materially understates traffic volumes and disregards Roseworthy's access constraints.

Because Appendix B depends entirely on these same flawed inputs, every subsequent calculation is compromised. Taken together, Appendices A and B form an evidence base that is partial, outdated, and incapable of demonstrating safe or sustainable access.

These same methodological weaknesses flow directly into Appendix B. The vehicle-trip numbers it presents are not independently derived but simply recalculated from Appendix A's obsolete averages, giving an illusion of precision while compounding error.

The following section demonstrates how this dependency distorts every conclusion the applicant draws about traffic growth and highway safety at Roseworthy.

APPENDIX B – DERIVED VEHICLE TRIPS

Appendix B is presented as the consultant's worked example of vehicle trip generation. Appendix B attempts to convert the average load figures in Appendix A into vehicle trip numbers. Yet the presented spreadsheet carries no date, no title, and no explanation of provenance - leaving councillors and the public to assume it is linked to Appendix A. This lack of transparency means **it has no proper evidential anchor and cannot be treated as reliable technical evidence.**

Critically, Appendix B is not a standalone dataset: as already noted, it is entirely derived from Appendix A's historic 2018/2019 averages which are already shown to be flawed. If Appendix A is unsound, then Appendix B cannot be credible.

Several further weaknesses make Appendix B particularly problematic:

- **NO DATE, NO TITLE:** Appendix B is presented without any date, title, or anchor. Councillors and the public are left to assume it is linked to Appendix A.

This lack of transparency alone undermines Appendix B's credibility as technical evidence and there is no accountability as to how the figures were produced.

- **DERIVED, NOT MEASURED:** Appendix B does not contain any real-world traffic survey data for Roseworthy. Instead, it back-calculates vehicle trips by dividing tonnages by the "average loads" in Appendix A.

This circular method presents derived estimates as establish fact, obscuring real growth and localised risks.

- **OUTDATED BASELINE:** Appendix B presents 2018/2019 trip totals as though they still apply today. The TAN's baseline figure of **11,704 vehicle movements** reflects only 2018/19 throughput. Yet the applicant's own records confirm throughput has already increased by ~32% (from ~380,000 tonnes in 2019 to over 500,000 tonnes today). Extrapolating this known growth to 2025 yields an equivalent projected total of **around 15,503 movements**, not 11,704.

Treating 11,704 as if it were a current figure in 2025 is simply not credible.

- **OUTDATED AND STATIC:** Appendix B freezes traffic at 2018/19 levels, presenting a false impression of stability. In reality, throughput has grown substantially since then and continues to rise.
Current traffic levels are already far above what Appendix B admits.
- **EXPONENTIAL GROWTH IGNORED:** Appendix B fails to project traffic forward. Applying the applicant's own observed growth rate (~5.2% per annum) to the 2018/19 baseline produces dramatically higher figures - around **15,500 vehicles today (2025)**, rising to **~33,000 by 2040** (see **TABLE 1, FIGURE 1** and **FIGURE 2**). This trajectory unequivocally shows how the TAN's static baseline understates the true and escalating transport impacts Roseworthy would face.
- **EXAGGERATED PRECISION:** The consultant's "forecasts" are presented with apparent accuracy, but they are in fact circular estimates derived from outdated Splattenridden averages.

There is no transparent link to current operations or growth trends, giving a false impression of reliability.

- **POLICY NON-COMPLIANCE:** **Cornwall Local Plan Policy 27** requires robust, up-to-date, site-specific evidence of safe and suitable access. An undated, back-calculated spreadsheet based on six-year-old data from another site does not meet this test.

PROJECTED VEHICLE NUMBERS IF GROWTH SINCE 2019 IS APPLIED

The following table (TABLE 1) projects vehicle numbers if the averaged 5.22% per annum growth observed since 2019 is applied.

It **extrapolates the TAN's own baseline** (Appendix B) across vehicle type and total vehicle movements, beginning from the 2018/19 figures supplied by the applicant.

Note: These projected vehicle number figures **EXCLUDE ANY additional traffic numbers associated with FUTURE WOOD WASTE PROCESSING AND FARM PLASTICS** (and these numbers are not considered or modelled in the TAN either).

This table exposes an inconvenient truth: **the applicant's figures cannot credibly be treated as static.**

- **By 2025 (ie TODAY), the real baseline is already ~32% higher than the 2018/19 figures** presented in Appendix B.
- **By 2030** (today +5 years), projected traffic rises by over **70%.**
- **By 2035** (today +10 years), volumes will have more than **DOUBLED.**
- **By 2040** (today +15 years), volumes will have effectively **TRIPLED.**

TABLE 1

Projected Vehicle Numbers if Growth Since 2019 is Applied

Year	Total Vehicle Movements	Small Vehicles	Medium Vehicles	Large Vehicles	% Increase vs 2018/19
2018/19 (baseline)	11,704	3,080	4,745	3,879	–
2025 (today, adjusted for growth)	~15,503	4,077	6,288	5,138	+32%
2030 (+5 yrs)	~19,970	5,256	8,109	6,606	+71%
2035 (+10 yrs)	~25,726	6,766	10,444	8,516	+120%
2040 (+15 yrs)	~33,147	8,720	13,446	10,981	+183%

In other words, even on conservative assumptions which also exclude wood and plastics processing:

The TAN as presented significantly understates a traffic burden that will DOUBLE WITHIN A DECADE and TRIPLE WITHIN FIFTEEN YEARS.

VISUAL PROJECTION

This projection shows clearly how the reliance on historic averages in Appendix B disguises the real scale of traffic likely to use Roseworthy.

What is presented as a modest level of HGVs is, in fact, the beginning of a steep upward curve - one that Cornwall Council cannot responsibly ignore.

To illustrate this, the following graph (FIGURE 1) applies the data from Table 1 above extrapolating the applicant's own confirmed ~32% throughput growth since 2019 to their Appendix B baseline of 11,704 vehicles. Using the same average annual growth rate of

~5.2%, **the analysis compares the applicant's static figures with realistic, growth-adjusted projections over the next 15 years (until 2040).**

The result is plain:

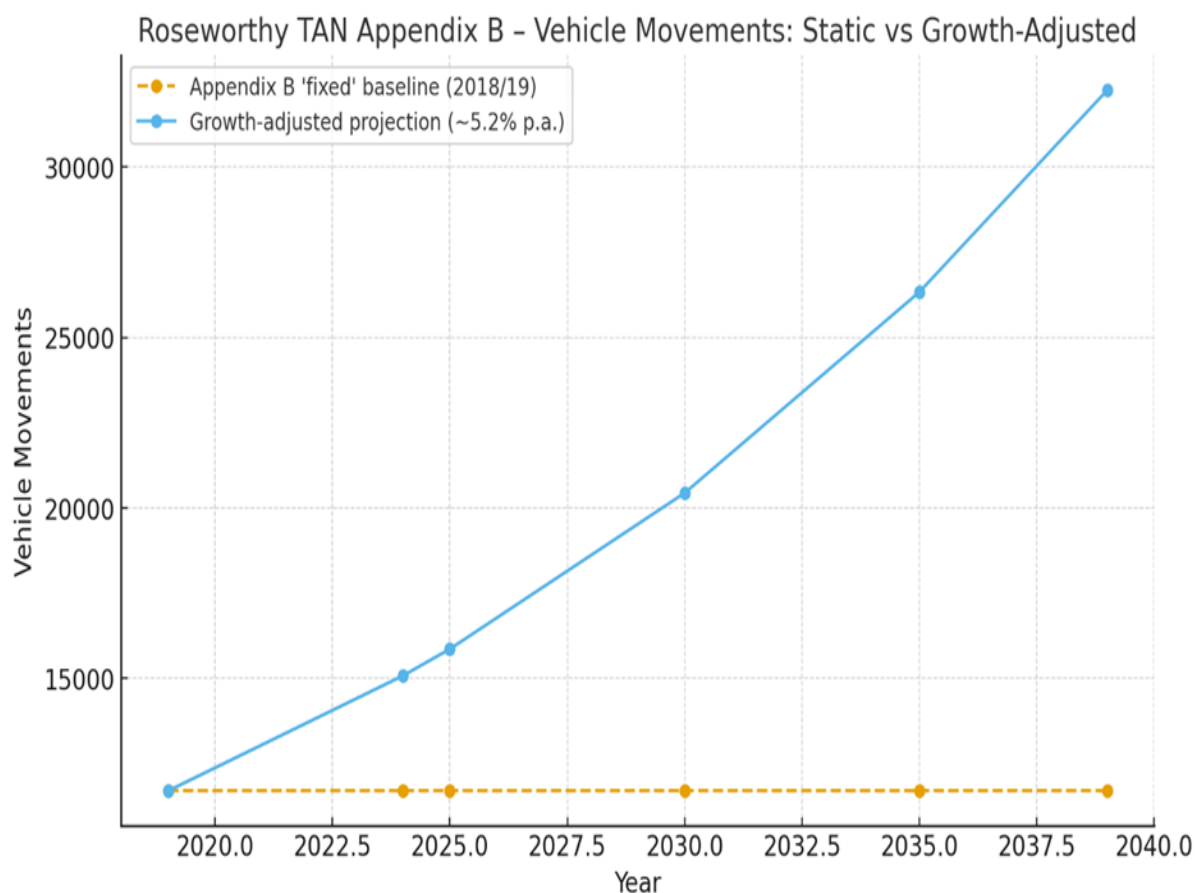
- Adjusted current traffic is already **~15,500 vehicles per year**, not 11,704.
- By 2040, that figure rises to **~33,000 vehicles annually** - almost **three times** the number presented to councillors and the public.

The evidence is set out visually below, showing both the recalculated vehicle movements and the projected growth curve:

The reality is even more unambiguous when visualised:

- The **applicant's TAN presents a flat, frozen baseline of 11,704 trips, unchanged since 2018/19.**
- In contrast, growth-adjusted projections rise sharply, reaching **~33,147 by 2040.**
- Councillors and the public are therefore being **presented with an assumption that traffic will remain static** when, in reality, the **applicant's own figures demonstrate exponential growth.** This **assumption also conflicts directly with Cornwall Council's Resources & Waste Strategy**, which commits to raising household recycling and composting rates from 34.1 % in 2022/23 to 65 % by 2035. Achieving that target will **inevitably generate far higher volumes of green and food waste requiring transport and processing** - making the notion of fixed traffic volumes at Roseworthy wholly unrealistic.

FIGURE 1



Both the table and graph demonstrate how the **continued reliance on historic Splatterridden averages masks the true and escalating highway burden** that Roseworthy will face. Yet this reality is completely ignored in the TAN.

What has been presented as a modest level of HGVs is, in truth, the **beginning of a sustained and accelerating traffic surge**. Councillors are therefore being asked to accept evidence that **materially understates both current and future transport impacts**.

This omission is not procedural - it is substantive. It places the TAN in direct conflict with:

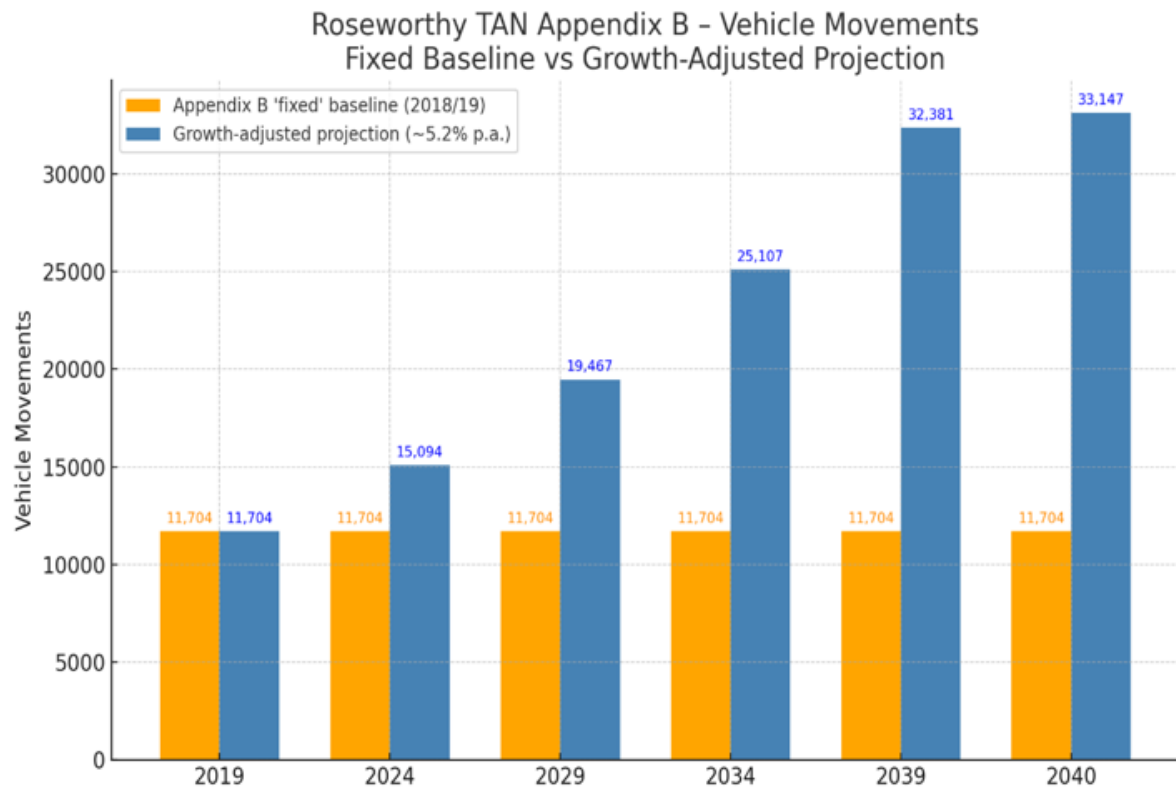
- **Cornwall Local Plan Policy 27**, which requires robust, up-to-date demonstration of safe and suitable access for all users; and
- **National Planning Policy Framework (NPPF) paragraph 111**, which requires refusal where residual cumulative transport impacts are severe.

COMPOSITION OF VEHICLE MOVEMENTS

The composition of these trips also matters – see FIGURE 2.

Appendix B treats large, medium, and small vehicle categories as interchangeable averages.

FIGURE 2



In reality, the majority of movements are likely to be large HGVs because the applicant intends Roseworthy not only to replace the existing Splattenridden site but also to absorb approximately 85 percent of the green-waste flows from the applicant's network of seven HWRCs and town-council collection points (ie excludes Penzance and St Erth).

By extrapolating the TAN's own 2018/19 breakdown of vehicle size in Appendix B **using the same average annualised growth rate of 5.22 % observed between 2019 and 2024, it is possible to visualise how site traffic composition and magnitude can be expected to evolve over the next 15 years.**

This analysis demonstrates that the **TAN's conservative 2018/19 baseline is already invalid when adjusted for observed growth** and becomes progressively untenable over time. Based on the applicant's own figures(as set out in **Table B1** below), projected increases over the next decade - **measured from current traffic levels**, not from the 2018/19 baseline - show that:

- From **2019 (baseline)** to **2029 (+10 years)**, total daily two-way trips are projected to rise from **34 to 57 vehicles per day** - an increase of approximately **67 percent**.
- From **current 2024 levels (~44 vehicles per day)** to **2029 (+5 years)**, movements increase by a further **30 percent**, reaching the same **57-vehicle** level.
- Within **10 years from today (by 2034)**, daily movements rise again to around **73 vehicles per day**, more than **doubling** the 2019 baseline and confirming an accelerating upward trajectory.

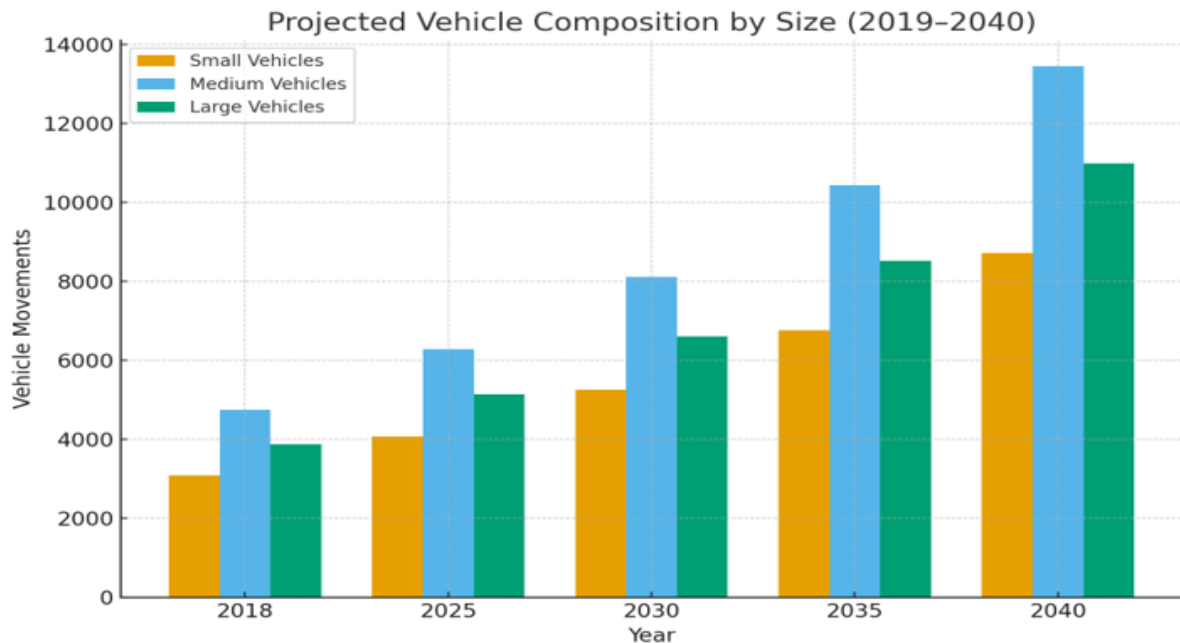
These figures, taken directly from Table B1, demonstrate that traffic associated with the proposed development cannot credibly be treated as static or marginal. They also confirm that the same annualised growth rate which increased throughput from 380,000 to 500,000 tonnes between 2019 and 2024 translates directly into rapidly escalating vehicle movements. When applied to Appendix B's fixed 2018/19 dataset, this growth causes the applicant's "static" trip numbers to balloon within only a few years — rendering the TAN's traffic evidence both out of date and unsafe as a basis for assessment.

Illustrated below, the bar charts make this point visually unmistakable: **traffic increases exponentially and is dominated by larger, slow-turning HGVs** that must cross both carriageways to enter or leave the site, with inevitable consequences for road safety, congestion, and residential amenity.

- **FIGURE B1** on the following page shows **the projected vehicle composition by size** between 2019 and 2040, highlighting the disproportionate growth of medium and large HGVs.
- **TABLE B1** converts these figures into daily two-way trips, showing the **escalation from 34 to 73 vehicles per day (146 total trips) over 15 years from the 2019 baseline**. On a growth-adjusted basis, this means HGV traffic will more than **DOUBLE from today's levels within the next decade**.

- Finally, **FIGURE B2** presents the same dataset as a stacked-bar chart, making the **trajectory visually unmistakable - traffic increases exponentially and is dominated by large, slow-turning HGVs** that must cross both carriageways to enter or leave the site, with inevitable consequences for road safety, congestion, and residential amenity.

FIGURE B1



When the same data are presented as average daily two-way trips by vehicle type, the potential implications for Roseworthy become undeniable.

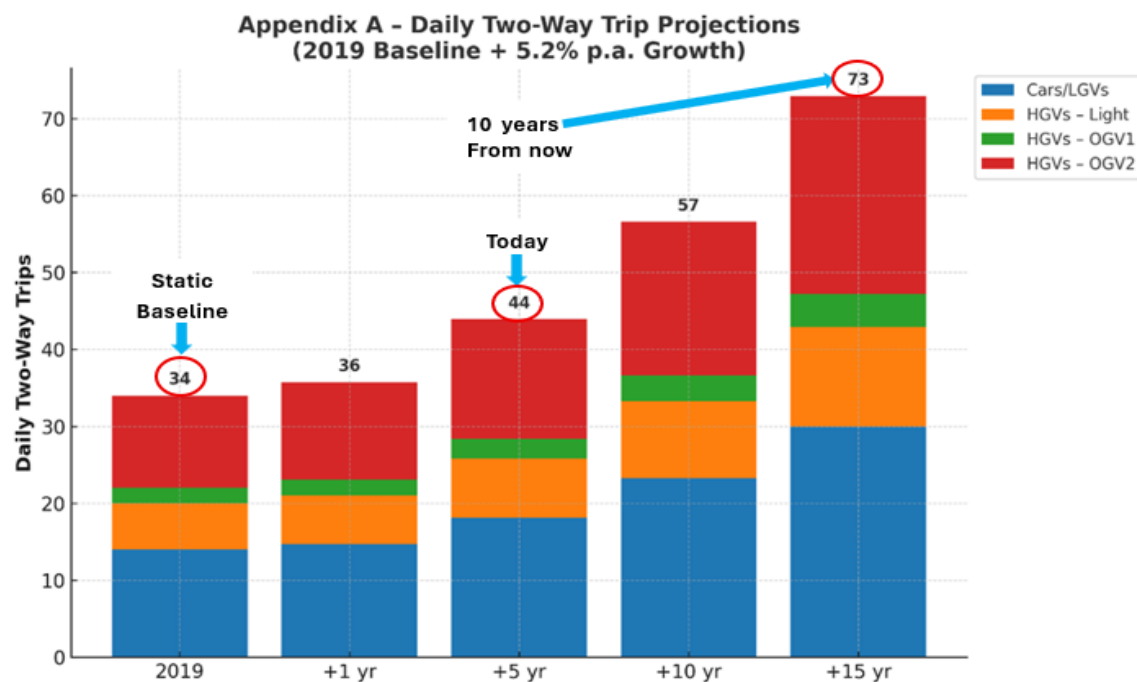
The TAN's stated 34/35 vehicles per day - based on static 2019 figures rather than a realistic 2024 baseline - understates current volumes and masks the rapid escalation already under way.

TABLE B1

Projected Daily Vehicle Trips if Growth Since 2019 is Applied

	Static Baseline ↓		Today ↓		10 years from now ↓
Vehicle Type	2019 (baseline)	2020 (+1 yr)	2024 (+5 yr)	2029 (+10 yr)	2034 (+15 yr)
Cars/LGVs	14	14.7	18.1	23.3	30.0
HGVs - Light	6	6.3	7.7	10.0	12.9
HGVs - OGV1	2	2.1	2.6	3.3	4.3
HGVs - OGV2	12	12.6	15.5	20.0	25.7
Total	34	35.8	43.9	56.6	72.9

FIGURE B2



The result when considering the impact of extrapolating the static baseline data is telling:

Heavy-goods traffic would dominate local roads almost from day one and overwhelm the network within only a few years.

IN SUMMARY

- Appendix B is not independent evidence - it is a derived dataset with no date, no anchor, and no transparency.
- It relies entirely on outdated 2018/19 averages from Appendix A, despite throughput growth of ~32% since, undermining the credibility of all derived transport evidence.
- Once that projected growth is applied, vehicle numbers are significantly higher than presented, with disproportionate impacts from large HGVs.

CLOSING COMMENTARY

This analysis makes clear that Appendix B cannot be treated as credible technical evidence. **Appendix B is a derivative spreadsheet, undated, untitled, and entirely dependent on Appendix A's obsolete 2018/19 averages.**

Despite the applicant's own data confirming ~32 % growth in throughput since 2019, **no adjustment has been made.**

- Once that projected growth is applied, vehicle movements escalate sharply - dominated by large, slow-turning HGVs - with cumulative impacts that are far greater than represented.
- Such evidence cannot credibly demonstrate safe access under **Cornwall Local Plan Policy 27** or meet the **NPPF requirement** that developments be refused where residual cumulative transport impacts are severe.

WIDER IMPLICATIONS

This analysis exposes **three critical flaws** in the applicant's transport evidence:

1. **CONCEALED INTENSITY:** By clinging to unadjusted 2018/19 data, the TAN fails to reveal the true current scale of traffic. **The real baseline is already far higher, and the 15-year outlook is starkly incompatible with highway safety** on Roseworthy Hill, or from Connor Downs and Roseworthy itself.
2. **APPENDIX B LACKS CREDIBILITY:** It has **no title, no date, and no explanatory text** anchoring it to current conditions. To present this as evidence is methodologically unsound.
3. **DISPROPORTIONATE BURDEN:** The applicant's own TAN confirms that more than 86 % of Cornwall's total green-waste flows will be directed to Roseworthy. This means the **Roseworthy Hill route will absorb virtually all HGV movements from day one, while additional growth will inevitably spill through Connor Downs.** The result is a severe and accelerating concentration of traffic on roads that are already constrained, steep, and unsafe - an outcome Cornwall Council cannot responsibly ignore. To suggest that vehicle numbers at Roseworthy will somehow remain fixed at 30 per day, and through Connor Downs at only five or six, is demonstrably untrue and materially misstates the operational reality.

The use of a six-year-old dataset as if it were a valid baseline is indefensible. It systematically under-represents current and future traffic volumes and therefore fails to provide a credible assessment of highway safety.

On the applicant's own numbers, **the reality is clear: traffic growth is exponential, not static, and the risks to Roseworthy and Connor Downs will escalate year on year.**

This escalation also exposes further inconsistencies across the applicant's evidence base, particularly **regarding how much of its operation is to be transferred to Roseworthy and what proportion of Cornwall's green-waste the site is actually intended to serve.**

INCONSISTENCIES AND INTERNAL CONTRADICTIONS

ON OPERATIONAL TRANSFER

The applicant's Transportation Advisory Note (TAN) **repeatedly claims that "85 percent of Cornwall's green waste"** will be **routed to Roseworthy**. This statement does not accurately reflect the underlying data. The percentage refers only to the applicant's own collection network - seven of nine HWRCs and several town-council contracts formerly served by Splattenridden - not to all of Cornwall's green-waste arisings. Cornwall operates many more HWRCs county-wide and processes substantially higher tonnages through other contractors.

Even within that limited network, the applicant's operations have already expanded by approximately 32 percent since 2019, increasing from about 380,000 tonnes to over 500,000 tonnes today. Applying this same growth rate to the seven HWRCs proposed for Roseworthy would result in a rapidly escalating tonnage share that far exceeds the "static" volumes modelled in the TAN. In practice, the Roseworthy site would become the principal processing hub for almost all of West Cornwall's green waste, drawing in heavy-goods movements from across the county road network.

The inconsistency is made worse by contradictory statements across the applicant's documentation. Earlier correspondence quoted within the TAN (page 2) records that *"the operation would be moved from Splattenridden"* and that future assessments should be *"based on the Splattenridden operation."* This wording clearly implies a total transfer of throughput and traffic to Roseworthy. Yet only one page later, the TAN claims that *"the proposal will mean that 85 percent will come to Roseworthy and 15 percent to Splattenridden."* These two positions are mutually exclusive. Which is it?

Either Splattenridden remains operational - in which case **the cumulative traffic from both sites must be assessed under Cornwall Local Plan Policy 27 and NPPF paragraph 111-** or it closes entirely, in which case **100 percent of existing and future movements** would transfer to Roseworthy.

The applicant has **not provided any definitive statement, schedule, or planning condition clarifying which scenario applies**. Without that clarity, Cornwall Council cannot credibly assess highway capacity, emissions, or cumulative safety risk.

In short, the TAN rests on **contradictory premises** about the scale of the proposed operation and therefore **materially understates the cumulative highway burden** that Roseworthy would bear.

The contradictions outlined above are not academic: they go directly to the reliability of the Transport Advisory Note as a whole. If the applicant cannot define whether one or two major processing sites will operate, or what volume of heavy-goods movements Roseworthy must accommodate, then its accompanying visibility and safety mapping cannot possibly provide a sound or proportionate assessment.

It is therefore necessary to examine **Appendix C**, which purports to demonstrate access safety, but omits the very sections of road most affected by the projected HGV flows - notably the blind bends, steep gradients, and constrained geometry of Roseworthy Hill.

APPENDIX C – VISIBILITY MAPPING AND OMITTED SAFETY CONSTRAINTS

These escalating traffic projections make the omissions in Appendix C even more serious. Appendix C's map-based diagrams claim to illustrate safe access, yet they confine analysis to a narrow corridor of roughly 215 metres either side of the site entrance - omitting the longer HGV approach route where the gradients, bends and poor intervisibility create the greatest risks. The result is an oversimplified and incomplete representation of highway conditions that gives an impression of safety wholly inconsistent with the site's physical reality.

The applicant's Appendix C consists of a single schematic visibility plan and a small number of cropped photographs, presented to suggest that "excellent visibility" exists in both directions at the proposed site access on Roseworthy Hill.

No surveyed data accompanies this plan - there are no measured splays, no speed survey, and no confirmation that the geometry meets **Design Manual for Roads and Bridges (DMRB) standards for a 60 mph rural road**. The drawing is therefore a conceptual desk exercise rather than a site-specific safety assessment.

Under **DMRB CD 109** and **CD 123**, the minimum *stopping-sight distance* for a single-carriageway road subject to the national speed limit is **160 metres**, measured from the driver's decision point along the actual nearside alignment. Visibility cannot properly be assessed "in isolation" from gradient, curvature, or driver behaviour. Yet the applicant's mapping flattens all of these variables into a two-dimensional plan, omitting the very factors that determine real-world stopping distance and collision risk.

The following evidence (**FIGURES C1, PLATES 1 – 8**) demonstrates visually why this approach is unsafe and not representative of real site conditions. Each image documents the physical road conditions along the full HGV route - including the approach gradients, bends, and entrance itself - compares these with the claims made in Appendix C and highlights material departures from recognised highway-safety standards.

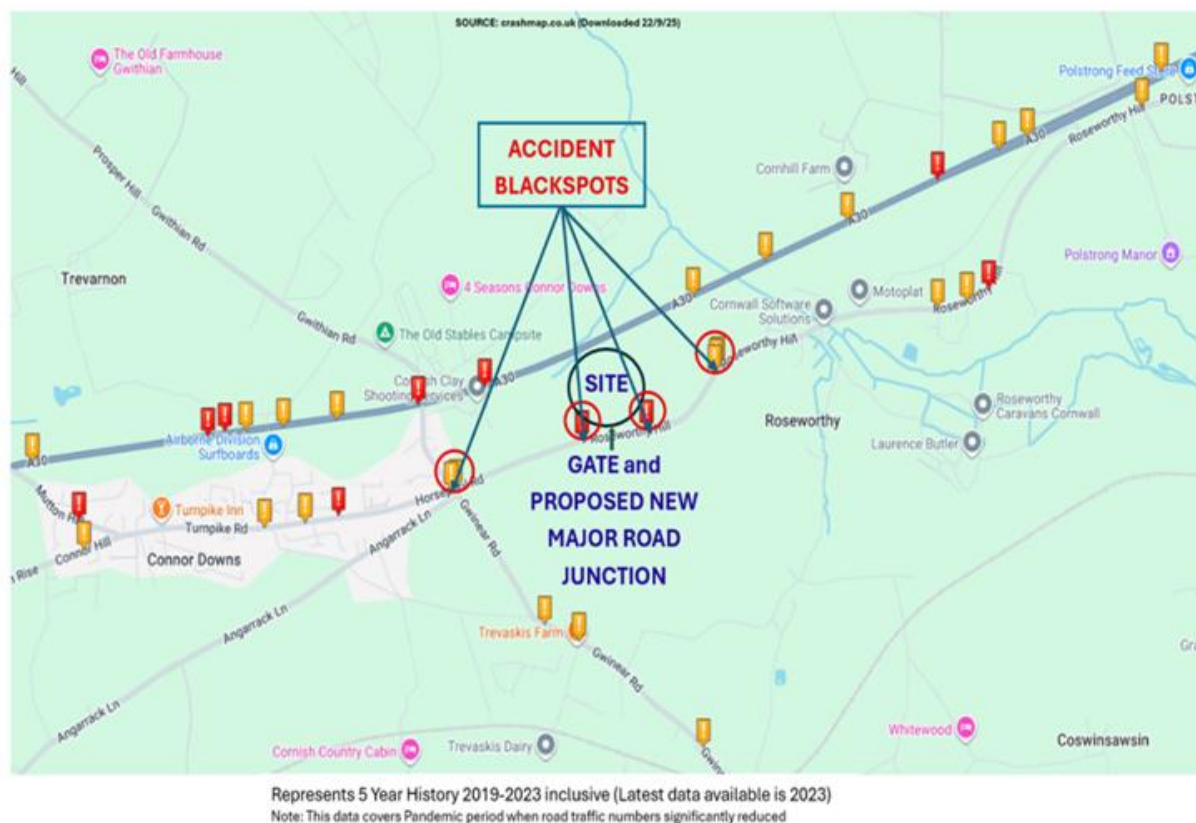
FIGURE C1 - CrashMap: Collision Record and Road Safety Context

The CrashMap extract below (Figure C1) presents official Department for Transport collision data for Roseworthy Hill and its immediate approaches.

Even though the **CrashMap dataset** covers a five-year period that includes the pandemic - when national traffic volumes were abnormally suppressed- it still **records multiple injury collisions on both sides of the proposed site entrance**. These include incidents clustered at the blind western bend near Horsepool Road and the steep fall thereafter past the site and towards Roseworthy, precisely where the applicant's Appendix C claims "excellent visibility".

FIGURE C1

LATEST 5 YEAR ACCIDENT DATA



This spatial pattern is significant: it **exposes a clear and consistent accident history along the very stretch of carriageway now proposed for HGV access**. The topography, narrow alignment, and absence of verges or refuges combine to produce frequent near-misses and under-reported minor incidents not captured in official records. Residents have long observed vehicles, cyclists and pedestrians forced into hedges, sudden braking on the gradient, and reversing manoeuvres when two large vehicles meet.

By contrast, the TAN describes Roseworthy Hill as "operating safely for many years with varied levels of agricultural movements" and asserts that emerging visibility from the access is "excellent in both directions." The CrashMap evidence proves otherwise. **This is a hazardous section of rural highway where the interplay of gradient, curvature, and driver speed behaviour already presents elevated risk under existing traffic conditions.**

Introducing slow-turning HGVs that must cross both carriageways at this point - on a 60 mph limit road with no verge or refuge - will significantly increase collision probability for through-traffic and waiting vehicles alike. The cumulative effect is self-evident: higher volumes of heavy, slow-moving vehicles on a constrained, accident-prone alignment will magnify both the frequency and severity of incidents.

Cornwall Council must therefore consider not only the historical accident record but the projected exposure rate implied by the applicant's own Appendix B traffic forecasts.

With vehicle movements projected to more than double within ten years, the risk profile of this stretch of road will worsen substantially, directly engaging **Cornwall Local Plan Policy 27 and NPPF paragraphs 110–111**, which require refusal where cumulative highway impacts are severe.

PLATE 1 - Existing Highway Context – West Approach; View of Approach Towards Site Entrance from Roseworthy & Driver Visibility

This photograph (PLATE 1) shows the approach from **Roseworthy**, travelling **east and uphill** toward the proposed site entrance.

The road leaving the hamlet is **narrow, steeply graded**, and quickly becomes subject to the **national speed limit (60 mph)** - a change from the Roseworthy dip's 40 mph zone. As vehicles climb the hill, **forward visibility is restricted** by the vertical crest and by successive **blind bends** that interrupt the driver's line of sight.

The photograph captures the point at which westbound drivers first regain limited visibility of the road ahead - the earliest moment at which the proposed site entrance would become perceptible. At this distance, drivers travelling up to 60mph would have only a few seconds to identify and react to any slow-moving or turning HGV at the access. These features, together with the absence of verges, footways, or lighting, mean that approaching traffic has only a narrow and unsafe reaction window before reaching the hazard.

The applicant's **Appendix C** mapping omits this entire section of carriageway, presenting instead a simplified straight alignment that falsely implies long-range visibility and negligible risk. In reality, any HGV emerging from the entrance would do so directly into the path of oncoming traffic accelerating up the hill at speeds of up to 60mph with little opportunity for drivers to brake safely.

The **CrashMap record confirms multiple collisions in this vicinity, including on both approaches to the proposed access**, underscoring that this is already a **known accident corridor**. The hazard-warning markings visible in this photograph further demonstrate that this is **not a safe or forgiving road environment** under current conditions.

Under **DMRB CD 109**, visibility on a 60 mph single-carriageway should extend at least **160 metres** from the driver's decision point; the geometry shown here falls well below that threshold. To describe such conditions as offering "excellent visibility," as the applicant's TAN asserts, is therefore **technically inaccurate and presents an incomplete picture of actual visibility on the ground**.

PLATE 1

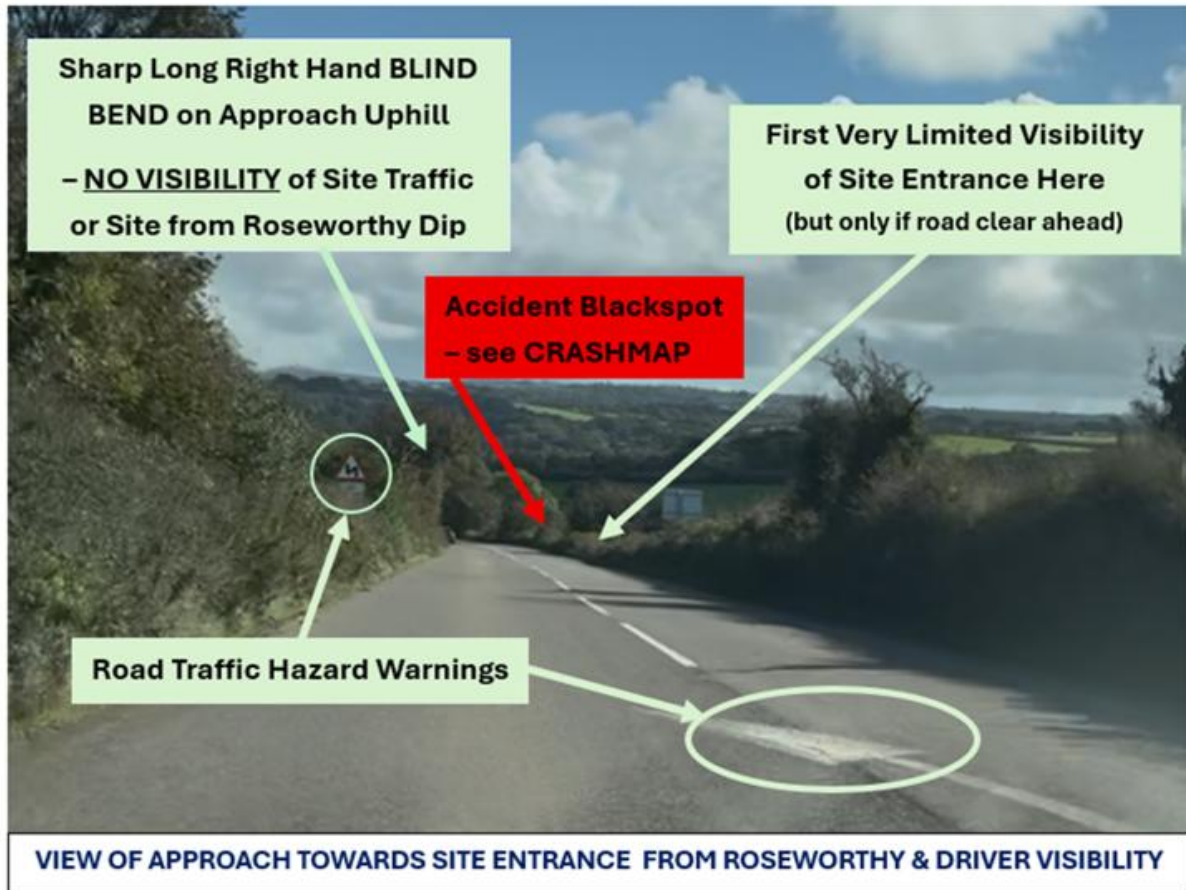


PLATE 2 - Existing Highway Context – West Uphill Approach; View from Roseworthy toward Proposed Access

PLATE 2 shows the **uphill approach from Roseworthy**, looking east toward the point where the proposed access is sited (behind the central tree and hedge in the middle distance). Although the carriageway here appears broadly straight, the **entrance itself remains completely obscured** until late. Vehicles travelling uphill at the **national speed limit (60 mph)** therefore have little advance warning of slow-moving/stationary traffic entering or departing the site.

The applicant's TAN repeatedly refers to this gateway as an existing "**junction**" that has "operated safely for many years." In reality it is nothing more than a **field-gate opening to the live carriageway via public lay-by**. The proposal would **create a major industrial**

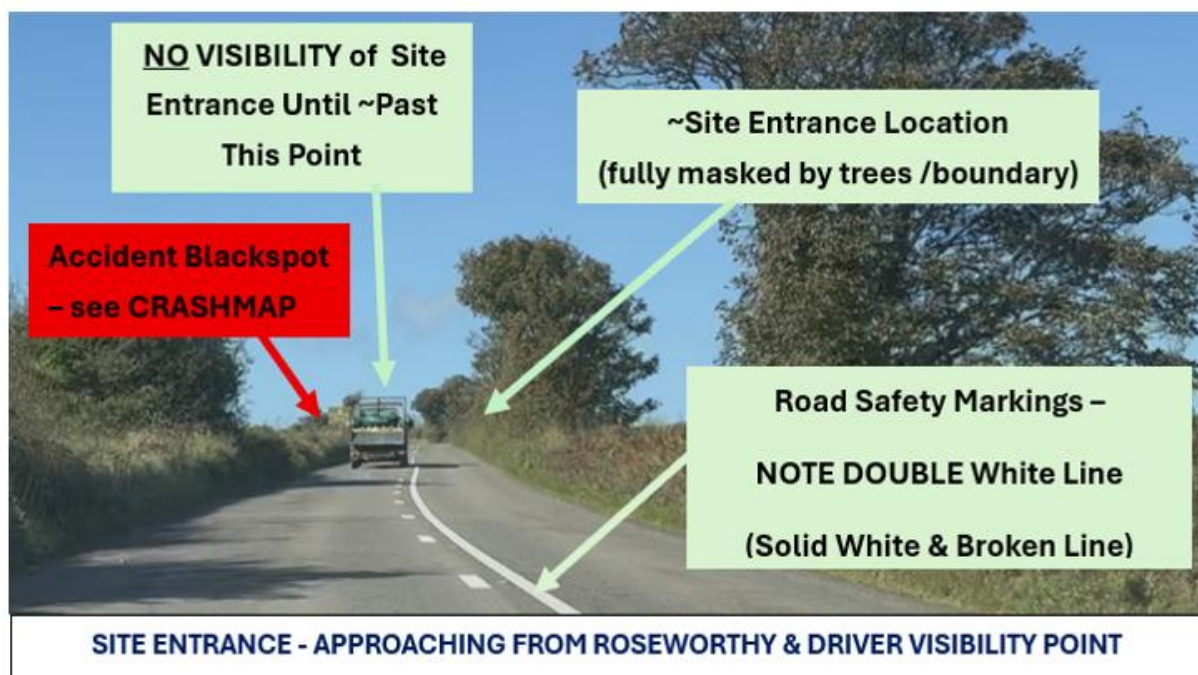
junction where none currently exists, transforming a lightly used agricultural access into the main entrance for frequent HGV movements.

Treating it as if a safe junction already exists misrepresents the site's physical characteristics: there are **no turning lanes, no visibility splays, and no refuge area** where vehicles can wait clear of traffic.

The photograph clearly shows that the centre-line markings on this section of Roseworthy Hill consist of one solid and one broken line - not the continuous broken line claimed in the TAN. This configuration designates a recognised hazard zone, warning drivers of restricted forward visibility and prohibiting overtaking in one direction. In other words, the highway authority's own markings already acknowledge that this stretch of road presents a significant safety risk.

The TAN's statement that "Roseworthy Hill has a single broken centreline" invites readers to assume consistent geometry and visibility along the entire route. In fact, this photograph - together with Plates 2, 5, and 6 - demonstrates the opposite: multiple sections are marked as overtaking hazards or contain alternating solid and broken lines, each indicating restricted sight distance and elevated collision risk. The real-world geometry of Roseworthy Hill is therefore far more complex and dangerous than the simplified account presented in the TAN.

PLATE 2



Any HGV waiting to turn into the site would be forced to **stop within the live lane**, while exiting vehicles must **cross both carriageways** on a steep, narrow, unlit road. With no verge or footway, there is **nowhere for other road users to divert or take refuge**, creating a serious and foreseeable collision risk. The **CrashMap record confirms several accidents within this exact stretch** immediately west of the proposed entrance, illustrating how unsafe the location already is before any intensification of use.

At a design speed of 60 mph, **DMRB CD 109** requires a visibility splay of approximately **215 m in each direction** from the driver's decision point. Given the **screening vegetation, limited verge width, and change in elevation**, this standard cannot be met. The applicant's **claim of "excellent visibility" is therefore technically unsupportable** and inconsistent with the physical evidence.

In summary, this image demonstrates that the access described as an existing "junction" is in fact an **unsuitable field-gate opening on a hazard-marked, high-speed rural road**. The development would in effect **construct a new major junction in an inherently unsafe position**, where forward visibility and stopping-distance both fall far below accepted safety norms.

PLATE 3 - Existing Highway Context – Passing Site Uphill Towards West

This photograph shows the section of **Roseworthy Hill immediately beyond the proposed access point**, looking west uphill.

The image captures what a **westbound driver approaching the site entrance from Connor Downs** would experience: the proposed access remains completely hidden until the driver has already rounded the **blind bend and vertical crest** at the top of the hill. (If they meet oncoming traffic - like the truck shown - visibility is even later.)

PLATE 3



In other words, the **site entrance only becomes visible at the arrowed point**, leaving eastbound drivers only a few seconds to react if a slow-moving HGV were emerging or turning.

The **carriageway is narrow (7.3–7.5 m)**, steeply graded, again without verges, pavements, or lighting. Vehicles here are already travelling at **national-speed-limit conditions (60 mph)**, having accelerated downhill from Connor Downs; the combination of gradient, camber, and curvature severely constrains safe stopping distance.

The public lay-by shown in front of the gateway has long served as a safe stopping place between Connor Downs and Roseworthy. Despite this, the TAN misrepresents its status by implying that it could form part of the site access arrangement. In reality, the lay-by is part of the public highway, not the applicant's landholding, and has been used safely by drivers for decades.

Any HGV entering or leaving the site would have to pass directly across this lay-by, creating unavoidable conflict with vehicles parked or manoeuvring within it. The result would be a serious and ongoing safety hazard at the very point the TAN presents as a "safe and suitable access."

The CrashMap dataset also records collisions on this western approach—precisely the stretch shown here—confirming that it is already a hazardous location. Intensifying movements to accommodate **daily two-way HGV flows, projected to double within a decade, would multiply those risks substantially.**

In summary, what the TAN portrays as a "safe and suitable junction" is in reality a **concealed field-gate access directly abutting a long-standing public lay-by on a steep, high-speed, and visibility-restricted hill**. Converting it into a principal industrial access would be wholly inconsistent with **Cornwall Local Plan Policy 27** and the **NPPF's requirement that developments be refused where cumulative highway impacts are severe.**

PLATE 4 - Existing Highway Context – Approach Heading Towards Concealed Site Entrance from Connor Downs

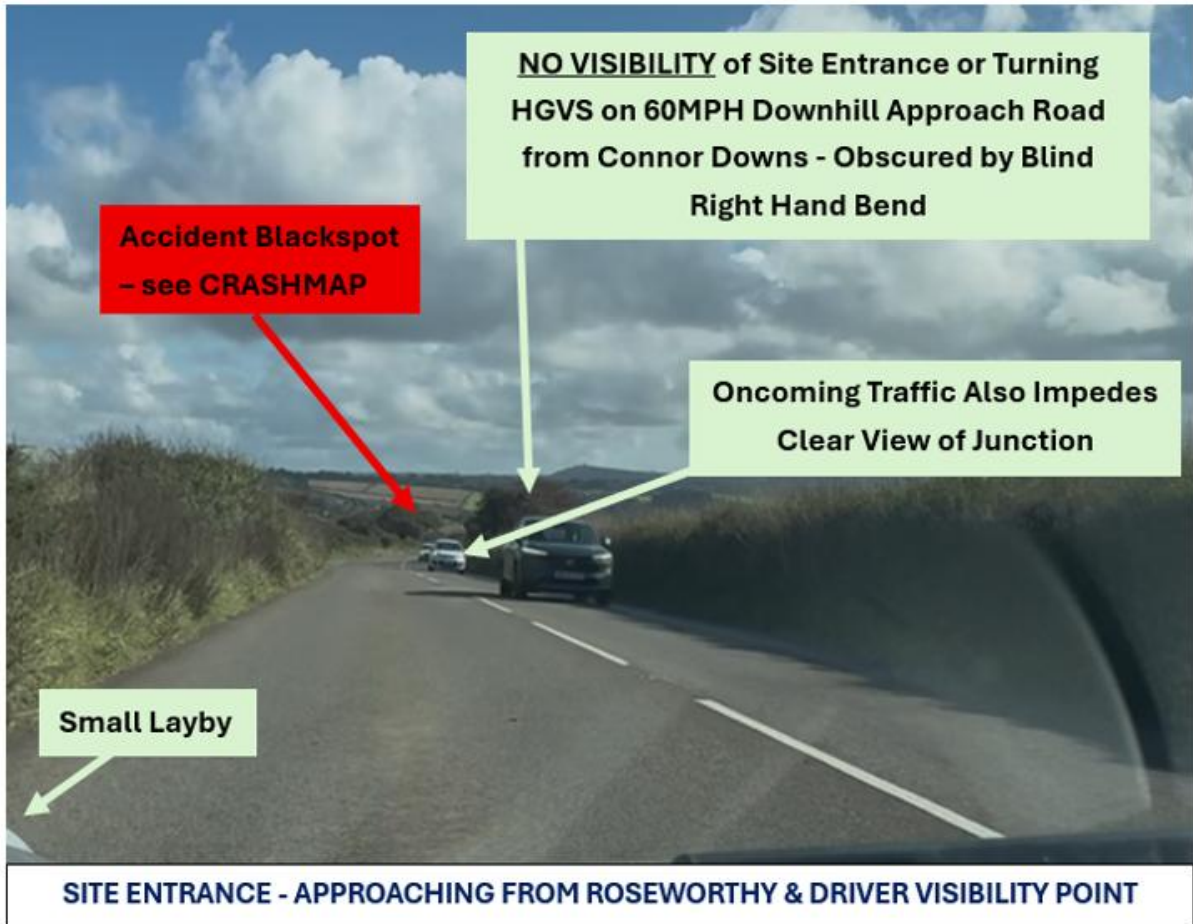
This photograph shows the **approach from Connor Downs**, descending steeply toward the proposed site access. The carriageway here combines a **downhill gradient and a tightening curve**, creating a constrained sections on Roseworthy Hill.

Vehicles travelling downhill in this direction are already at or near the **national speed limit (60 mph)**. Yet from this point there is **no forward visibility of the proposed entrance**: the combination of vertical curvature, boundary hedges, and the hill crest hides the access entirely until drivers are within just a few seconds of it.

The applicant's **Appendix C visibility plan omits this section altogether**. Instead, it **presents a cropped, idealised visibility envelope**, stopping short of the concealed approach zones and suggesting clear sightlines that simply do not exist on the ground.

Standard highway design practice - as set out in **DMRB CD 109 (Highway Link Design)** and the **Manual for Streets** - requires visibility splays to reflect *actual* stopping distances under prevailing gradients and approach speeds, not those of a hypothetical flat road. The submitted mapping fails that test entirely.

PLATE 4



In practice, the **downhill curvature compresses stopping-sight-distance** right where vehicles are still accelerating out of the Connor Downs limits. **Introducing slow, wide-turning HGVs at this point creates a “surprise hazard”** for approaching traffic, precisely where visual cues are poorest.

Despite this, Appendix C labels the eastern approach as having “excellent visibility.” The evidence of this photograph - and of the **CrashMap data showing an accident location just east of the site entrance** - demonstrates the opposite.

The claimed visibility is theoretical only: it assumes **trimmed hedges, level ground, and flattened plan-view geometry** that ignore the real-world effects of slope, shadow, and driver eye-height.

Even modest hedge growth, dust, fog, or wet-weather and evening sun glare would erase claimed sightlines. The result is a **hazardous and deceptive approach**, where vehicles emerging from the site would need to creep into the live lane to see, forcing downhill traffic to brake sharply - a scenario wholly inconsistent with **Cornwall Local Plan Policy 27** and the **NPPF requirement that residual cumulative impacts not be severe**.

Plates 5 & 6 - Existing Highway Context – HGV Route Via Roseworthy Hill

These two photographs, PLATES 5 and 6, show the **western approach from Roseworthy village toward the proposed site**, beginning immediately after the 40 mph zone ends. Within only a few metres, the road becomes subject to the **national speed limit (60 mph)** and bends sharply uphill through a series of long, blind curves.

Through Plates 5 and 6, the **alignment steepens and tightens**, leaving drivers with **no forward view of what lies beyond the bend**. Vehicles accelerating uphill or descending from the east emerge suddenly and often drift across the centreline due to the camber and road width. **This section lies outside the visibility grid shown in Appendix C** - yet it represents the exact stretch from where visibility of the upcoming site becomes apparent and where HGVs will enter and leave the site. Omitting it from the applicant's mapping disguises one of the greatest sources of collision risk.

PLATE 5



The **double solid centre lines** visible in Plate 5 mark a recognised hazard section where overtaking is prohibited. These road markings directly contradict the TAN's blanket claim that "Roseworthy Hill has a single broken centreline." In reality, **the geometry here is far from uniform: curvature, gradient, and narrow width, combining to create a corridor with almost no margin for driver error.**

The CrashMap data (referenced earlier in Figure C1) records a cluster of accidents precisely at the western exit of these bends - the point where traffic exiting the curves would meet slow-moving or queuing HGVs. Any tailback from the proposed site entrance would be encountered by vehicles still travelling at or near 60 mph, with almost no reaction time available.

Physically, the carriageway shown in Plate 5 and 6 provides **no verge, no shoulder, and no pedestrian refuge. The edges are soft and overgrown, frequently eroded by downhill runoff.** Appendix C overstates the available width by referring to a “defined verge width of 7.5 m,” but on the ground that dimension represents the *entire* carriageway, not usable verge space.

PLATE 6



From a sustainability and climate perspective, the **TAN’s claim that routing HGVs via Roseworthy Hill will “reduce journey distance and carbon footprint” is unsound.** The road from the A30 (Treswithian exit) via the Roseworthy valley are **narrow, twisting and steep**, forcing heavy vehicles to operate in low gears, brake repeatedly on descent, and accelerate hard on ascent - all of which will significantly increase additional fuel use, noise, and emissions.

There are **no safe passing places** between Roseworthy itself and the proposed access. The route feels enclosed, dark, and oppressive, with high hedges and **no refuge for walkers, riders or cyclists at any point.** In short, these two photographs depict the **real HGV approach corridor** - steep, constrained, and inherently unsafe. Yet this entire section is omitted from Appendix C’s visibility mapping. The result is an incomplete portrayal of the route on which all daily site traffic would depend.

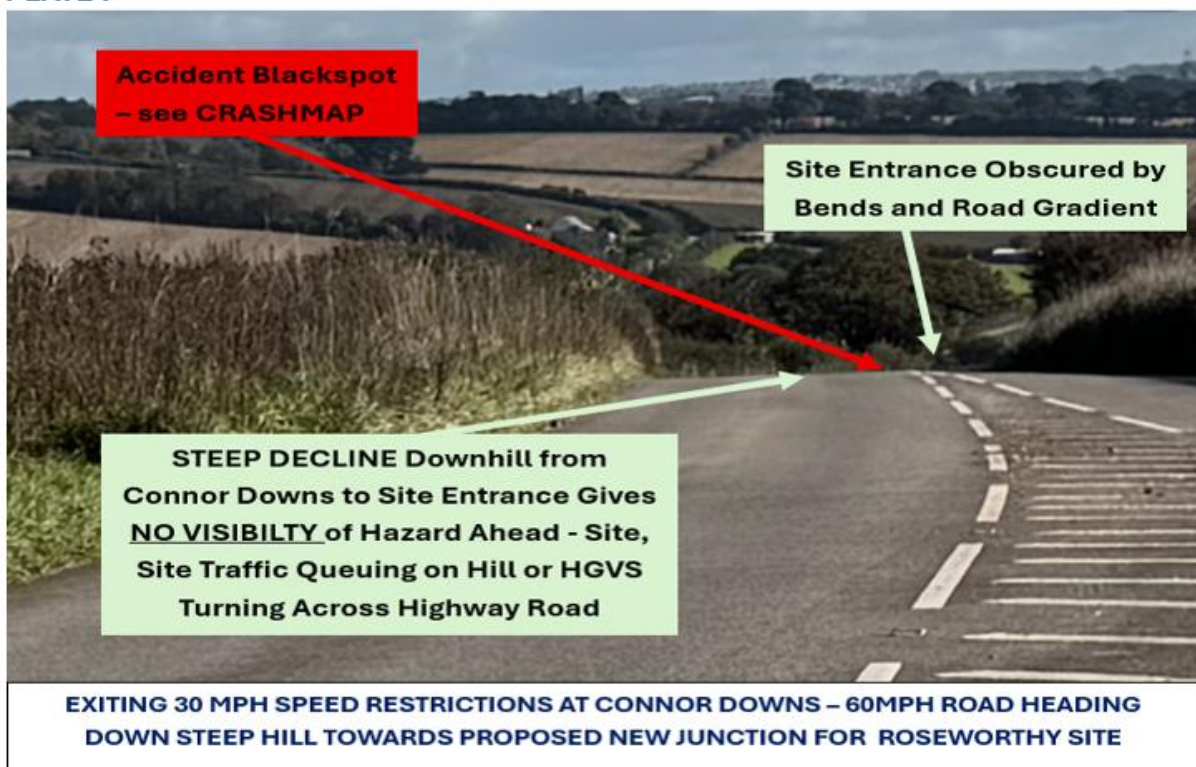
PLATE 7 - Existing Highway Context Eastern Approach - Vertical Gradient and Lane Geometry

This photograph shows the **steep downhill approach from Connor Downs** toward the proposed site entrance, taken just beyond the point where the **speed limit changes from 30 mph to 60 mph near Horsepool Road.**

Here, the **gradient falls sharply**, with a noticeable cross-camber sloping away from the centreline. Drivers accelerating out of the speed-change zone enter a section where the **road alignment bends and visibility ahead collapses**. At this point, there is **no advance warning** of the concealed access or of slow-moving HGVs turning across the carriageway into or out of the site.

Westbound drivers on this descent will naturally pick up speed; yet any **HGV** preparing to turn right into the site must do so **slowly, from near standstill, across both carriageways**. Conversely, vehicles leaving the site to turn right towards Connor Downs must first **block the eastbound lane** while gathering momentum to climb the hill. Both manoeuvres require occupying live traffic lanes, creating an unavoidable collision hazard.

PLATE 7



The Transportation Advisory Note (TAN) makes **no reference to this vertical geometry** at all. Yet **gradient and camber are critical determinants of stopping distance, sightline adequacy, and HGV acceleration performance**. Even where **Design Manual for Roads and Bridges (DMRB CD 109)** sight-distance values might appear to be met on paper, such figures assume level ground. On steep gradients like this, **real-world visibility and braking distances are materially reduced**.

This section also forms the **acceleration zone immediately following the 30 → 60 mph change**. Drivers exiting Connor Downs increase speed rapidly before encountering the first bend, compressing their available reaction time. Locating a high-turnover industrial access downstream of such a transition multiplies exposure to high-speed conflict, particularly in wet, dark, or foggy conditions.

The CrashMap data identifies a collision cluster at this very location, confirming that the existing alignment already carries a proven accident record. Any additional turning or queuing **HGVs will therefore exacerbate a known hazard corridor**, contrary to **Cornwall Local Plan Policy 27 and NPPF paragraph 111**, which require developments to ensure safe and suitable access for all users.

PLATE 8 - Passing and Manoeuvring Conflict

This photograph illustrates the **tight carriageway width that characterises the entire length of Roseworthy Hill**, not only at the proposed site entrance but **along the full stretch between Polstrong, west of Roseworthy, and Connor Downs**. There is **no respite anywhere** on this route - no verge, refuge, or safe margin for any other road users. Pedestrians, cyclists, and riders already face jeopardy at every point along this corridor.

At the location shown here - directly adjacent to the proposed site access - the physical constraint becomes critical. The **nominal carriageway width of 7.3 to 7.5 metres is further reduced by edge deterioration, camber fall, and encroaching hedge banks, leaving less than 3.6 metres of effective running width per direction**. This is **well below the swept-path envelope required for two HGVs to pass** without one yielding onto the verge or crossing the centreline.

The **Transportation Advisory Note (TAN)** nonetheless describes this as a “*safe, well-functioning access operating successfully for many years.*” **In reality, there has never been industrial-scale HGV use of this road**. It has functioned as a rural road serving local farms and local communities - not as a main distributor route or an access to a regional waste facility.

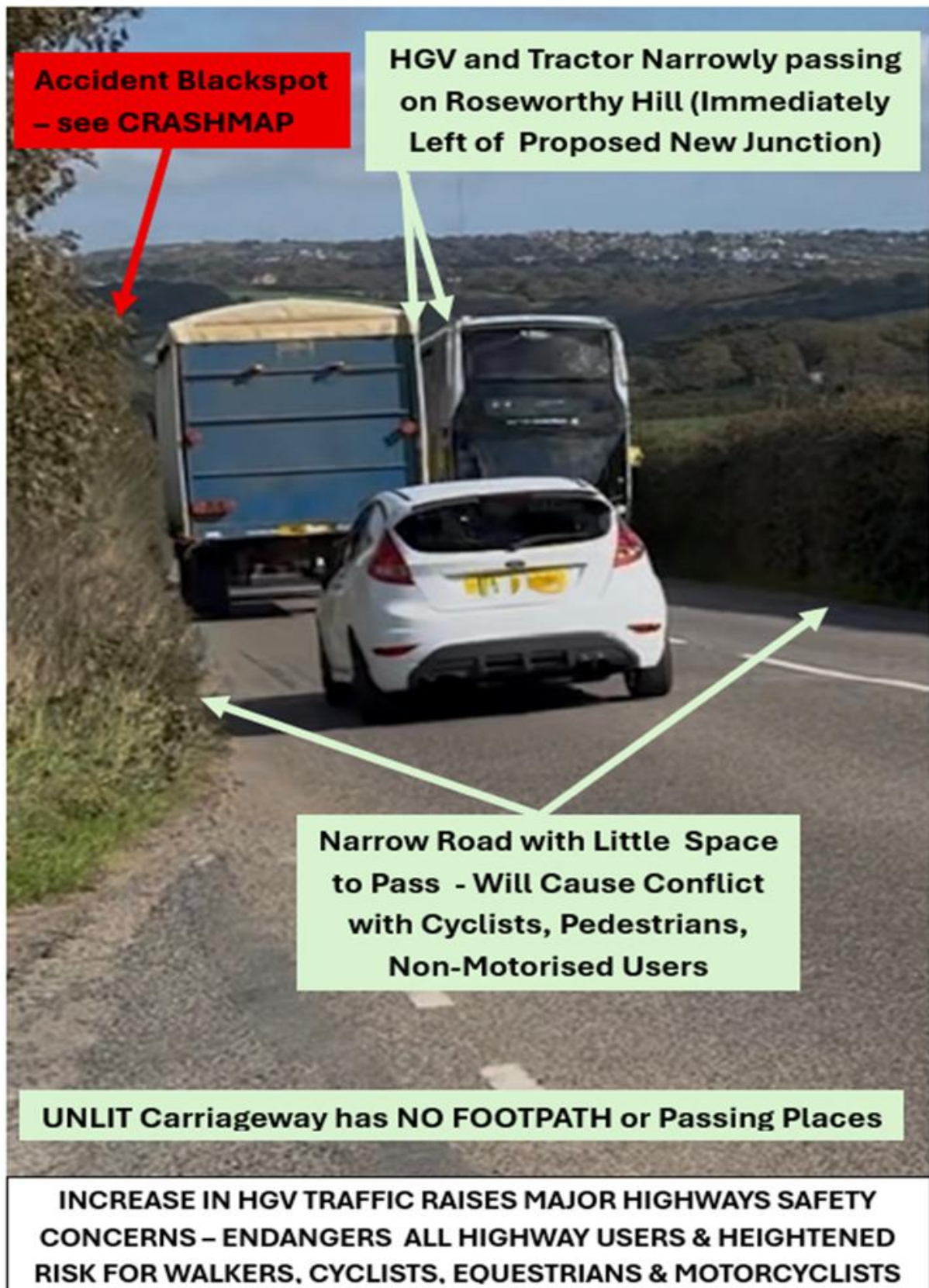
With daily two-way HGV movements expected to **double within ten years** (see Appendix B), **these constraints will inevitably cause conflict, verge overrun, and prolonged in-lane waiting** as large vehicles attempt to negotiate bends and gradients too tight for their geometry. The situation poses direct risk to all other road users and represents precisely the **cumulative impacts** that **Cornwall Local Plan Policy 27 and NPPF paragraph 111** require to be avoided.

Crucially, **Roseworthy Hill is a C-classified road**, never engineered or constructed to carry continuous heavy-goods traffic. It also forms the **designated “blue-light” diversion route** for emergency services when the A30 is congested or closed - a not-infrequent occurrence. Any increase in HGV queuing or blockage along this corridor would therefore obstruct an established emergency-access route, compounding both safety and resilience risks for the wider area.

This photograph demonstrates more than a localised pinch point: it exposes the **fundamental unsuitability of Roseworthy Hill as a whole** for heavy-vehicle traffic. **The absence of verges, refuges, or width consistency means that safe two-way HGV**

operation is physically impossible, and any intensification of use must significantly compromise highway safety along the entire route.

PLATE 8



Appendix C – Summary and Policy Conclusions

The evidence set out in Plates 1–8 demonstrates that **Appendix C cannot be treated as credible technical evidence**. Its schematic mapping and cropped photographs bear little resemblance to the physical conditions on Roseworthy Hill, which is a steep, winding, C-classified rural road constrained by hedge banks, cambers, and a complete absence of verges or refuges.

Although the applicant’s visibility plan purports to show “excellent sightlines”, **it relies entirely on theoretical measurements drawn on a flattened plan**, rather than true driver-eye positions or surveyed field conditions.

In practice, **steep gradients and camber variations render such theoretical sightlines meaningless**. Professional highway guidance recognises that **computer models cannot substitute for real-world driver behaviour or the off-tracking of articulated vehicles on gradients**. Sightlines must be measured to the point where an oncoming vehicle can first be perceived by the driver - not to a drawn tangent line on paper.

Similarly, **Appendix C presents isolated turning movements as if they were discrete events, ignoring the cumulative effect of multiple HGVs manoeuvring in both directions** on a confined carriageway. Established transport-safety principles emphasise that **short-term queuing or waiting on the live carriageway constitutes an unacceptable residual risk**, particularly where gradients, curvature and restricted width coincide.

These conditions are exactly those found along Roseworthy Hill.

Even if nominal DMRB sight-distance or swept-path standards appear satisfied on paper, **the combination of steep gradients, narrow widths and blind bends makes HGV access inherently unsafe**. The road simply lacks the geometric and structural resilience to absorb industrial traffic volumes of the magnitude proposed.

Two HGVs cannot safely pass easily without one encroaching onto the verge or into the hedge, or crossing the centreline, and the introduction of an industrial junction here would magnify that risk many times over.

Policy Implications

- **Cornwall Local Plan Policy 27** requires robust, site-specific demonstration of *safe and suitable access for all users*. The evidence here shows the opposite: *unverified, desk-based geometry ignoring real constraints*.
- **NPPF paragraph 111** directs that development should be *refused* on highway-safety grounds where the *residual cumulative impacts are severe*. The combination of documented accident history, poor geometry, and exponential HGV growth meets that test unequivocally.

Conclusion

Appendix C's mapping is a selective, desk-based construct and **cannot be relied upon as credible transport evidence**. The photographs, gradient profiles and CrashMap data together provide tangible, on-the-ground proof that the proposed access is **unsafe by design**. In reality, this development would convert a narrow, hazardous C-road - which also serves as the emergency "blue-light" diversion route when the A30 is closed - into a primary HGV corridor. **If approved, it would channel a rapidly growing fleet of heavy vehicles onto a sub-standard rural road where even existing traffic struggles to pass safely.**

In both planning and highway-engineering terms, the outcome would be indefensible. The only reasonable conclusion under **Policy 27** and **NPPF 111** is that permission should be refused on highway-safety grounds.

Overall Conclusion and Closing Statement

This objection has shown that the applicant's Transportation Advisory Note (TAN) and its Appendices A–C cannot be relied upon as independent or accurate evidence. Each is built on outdated, recycled, and non-site-specific data that misrepresents real conditions at Roseworthy Hill.

- **Appendix A relies on obsolete 2018/19 averages from a different site**
- **Appendix B simply derives new trip totals from those same flawed figures**
- **Appendix C omits the most hazardous sections of the route and therefore presents an over-simplified depiction of "safe access"** that is inconsistent with observed road geometry and recorded collision data.

Together, they underestimate traffic intensity, ignore growth, and portray a dangerous rural highway as fit for heavy industrial use. The submission therefore fails **Cornwall Local Plan Policy 27** and **NPPF paragraph 111**, both of which require refusal where cumulative transport impacts are severe.

In summary, I believe the applicant's transport case is methodologically unsound, the access geometry unsafe, and the predicted HGV intensification unacceptable.

On the basis of the information and reports submitted by the applicant, planning application PA24/08685 must be refused.

Kim Hillier

Please note that this objection is in respect of the proposed development. Whilst I have made every effort to present accurate information for your consideration, as I am not a decision maker or statutory consultee, I cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.