

1st November 2022

The Planning Inspectorate
Temple Quay House
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By email only.

Dear Sirs

Planning Application no. S62A/2022/0012

Proposal: Outline Planning Application with all matters reserved except for the primary means of access for the development of up to 200 residential dwellings along with landscaping, public open space and associated infrastructure works at land east of Station Road, Elsenham

Stansted Airport has an interest and is responding to this application as a major element of national transport infrastructure, and as the highway authority for the Airport's road network.

The application site lies due north of the airport in the small village of Elsenham. Elsenham lies 4km from the strategic highway network, embedded within a network of rural roads. Key neighbourhood facilities in Elsenham are limited, with Bishop Stortford providing the main services for existing and future residents. In order to reach the strategic highway network, vehicles from the proposed development would follow Hall Road and Thremhall Avenue, a road that is within the airport's ownership. A detailed review of the transport assessment has been carried out and these comments are written with the specialist advice provided by the Airport's transport consultant, Steer.

Firstly, it is worth noting that the context for the transport assessment (TA) submitted with the planning application is a transport strategy that has an overarching objective to encourage both development and background traffic to use Hall Road rather than Stansted Road. Previous TA's for development in Elsenham have set out how that objective would be met, including assessing the constraints within Stansted Mountfitchet, the capacity of Hall Road and route choice. At the moment, Hall Road has capacity while the route through Stansted Mountfitchet is congested at peak periods.

Despite the congestion issues, the route from Elsenham via Stansted Mountfitchet is sometimes quicker but suffers from congestion and variable journey times, especially in peak periods, and so the TA assumes traffic from the development would use Hall Road. However, given Elsenham's location, traffic travelling to Bishop's Stortford would still be likely to route via Stansted Mountfitchet. In addition, to discourage further traffic from using Stansted Mountfitchet, there have been proposals for various measures including traffic calming along Elsenham High Street, and contingency proposals in the travel plan (TP) and elsewhere to encourage sustainable transport modes. Though cost effective improvements to the transport network have been

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proposed, the residual cumulative effects on the local highway network in the Stansted Airport area are likely to be substantial.

There are alternative routes for traffic to use to reach the M11, A120 and other key destinations such as Bishop's Stortford but these have an acknowledged risk of an unacceptable impact on Stansted Mountfitchet and other local roads. The likelihood is that traffic will distribute between routes depending on typical delays experienced by drivers. It would be reasonable to assume that as the Hall Road route becomes busier due to the cumulative road traffic impact, there will be a greater propensity for drivers to use the alternative routes.

It is useful to refer to the conclusion of the appeal decision at land north east of Elsenham, reference UTT/13/0808/OP. The Secretary of State concluded that the likely extent of shift in traffic from Stansted Road to Hall Road would not show that the significant impact on Stansted Mountfitchet would be averted, and that the probability is that this would amount to substantial harm (paragraphs 15.94 to 15.99). It goes on to state that even if the increase in congestion would not amount to a severe impact, it remains the case that the scheme would bring significant volumes of additional traffic to a village that is a significant distance from local employment and service centers. It is unlikely that an increase in road traffic could be accommodated on the surrounding roads, contrary to LP Policy GEN1. This also weighs heavily against a conclusion that the scheme would amount to sustainable development.

In addition, in the Inspector's conclusions to the Examination of the Uttlesford Local Plan in 2014, further concerns were expressed on the sustainability of Elsenham and the effect of large-scale housing development on the local road network. Although the comments were made in the context of a proposed housing allocation of the withdrawn Local Plan, the content still applies. Paragraph 2.10 states;

"...It concludes that despite the advantage of potential train travel and improvements to bus services, traffic would increase significantly on the local network of rural roads within which Elsenham is embedded."

And paragraph 2.14 states;

"Recognising the inadequacies of the more direct routes to the strategic network via Stansted Mountfitchet, the promoter's strategy is to encourage traffic to use the longer route via Hall Road. This is not an ideal route to serve a settlement of the size that Elsenham would become..."

Mode Share

Reliance on 2011 travel to work mode share is questioned, as is the use of all England travel mode choice set out in Table 4.2 of the TA. Elsenham has a limited range of facilities, and residents will undoubtedly need to travel to larger conurbations for many purposes, and the suggestion that non-work trips typically achieve more sustainable patterns of travel is not necessarily true in a location such as Elsenham.

Table 4.4 of the TA provides a range of potential destinations. It is noted that only the local primary school is less than a 10-minute walk. This concern is possibly collaborated by reference to Table 4.1 of the TA and a simple comparison of the 2% walk mode for travel to work in Elsenham compared with 10% for Uttlesford as a whole.

It would therefore be appropriate to undertake surveys of recently completed housing development in Elsenham to provide an up-to-date journey and traffic profile. Post Covid travel patterns have reduced rail

usage and that has not simply resulted in lower work trip rates. There is evidence that in general there has been no decrease in peak hour commuting on most days of the week.

With a higher-than-average car occupancy per household in Elsenham, the use of cars is likely to be more prevalent than suggested, and therefore the traffic generation is likely to be underestimated in the TA.

Impact on Hall Road

Even with the potentially underestimation of traffic generation noted above, the TA suggests a 5% increase in traffic on Hall Road arising from just 200 housing units. This application needs to be considered in combination with other housing development proposals in Elsenham (pending and approved) as a number of developments have been brought forward around the eastern side of the airport that cumulatively result in a significant traffic impact on Hall Road. A range of committed development has been set out at Table 5.1 of the TA, but it is noted that no allowance has been made for the permitted expansion of Stansted Airport from around 28million passengers per annum (mppa) to 43 mppa. This is a significant omission.

The junction analysis provided in the TA indicates that the mini roundabout on Hall Road south of the airport link road will operate above 0.85RFC (the normally accepted point at which congestion starts to occur) as a result of the predicted AM peak hour traffic. It is noted that there has been no "in combination" analysis undertaken for this junction that would take account of other committed development, which should include the permitted expansion of operations at Stansted Airport to 43 million passengers per annum from a figure of around 28 million in 2019 (a level that is likely to soon be exceeded, following the impacts of Covid-19).

The volume of traffic on Hall Road and other minor roads around the airport has been an understandable area of concern shared by local residents and Essex County Council, as the highway authority, when considering the likely impact arising from the airport's expansion. Agreement was reached, as part of the planning approval for expansion of the Airport, on a range of measures to minimise traffic generation and a considerable amount of money has been made available to address any arising traffic impacts. It would be expected that in accordance with the principles established within the CIL regulations that other development should equally address such local impacts in accordance with the 3 tests: necessary to make the development acceptable in planning terms, directly related to the development, fairly and reasonably related in scale and kind to the development.

To conclude, Elsenham has a limited range of services and facilities, and any proposed development will be heavily car dependent. Although cost effective improvements to the transport network have been proposed, the residual cumulative effects on the local road network are likely to be substantial. Using Hall Road, a small local rural road, to gain access to the strategic highway network, utilises the Airport's roads at Coopers End roundabout which is an important access to the Airport. No allowance has been made for the permitted expansion of Stansted Airport to 43 million passengers per annum that was a planning application which was granted permission in June 2021. This is a serious and substantial omission that results in inadequacies of the modelling contained within the TA.

Yours faithfully



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