## S62A/2022/0012 - Notes for Hearing 12 Dec 22 - Transport Issues

## MAIN ISSUE 1 – TRANSPORT SUSTAINABILITY

Elsenham has only a limited range of facilities and services, meaning that for most day-to-day needs, residents are required to travel to surrounding towns, for which public transport options are limited. This is confirmed in the Census data which shows that 81% of commuting journeys made by Elsenham residents are by private car. Rail accounts for 13% and bus 1%, again confirming that residents are highly reliant on car journeys. Even if the frequency of the No7 bus service is improved, as proposed, its long journey times and limited destination options will remain and there is no evidence that this will materially increase bus mode share or reduce reliance on car journeys to any significant extent.

Existing bus stops on Henham Road are approximately 1.2km from the site. The developer proposes to relocate these closer to the site access which will reduce the walking distance to about 1km. The bus stops on Station Road are approximately 0.6km from the site but involve using the level crossing or the very high footbridge (with no ramps or lifts). Therefore, none of the proposed dwellings will lie within the recommended 400m walking distance to a bus stop. This combined with the limited bus route options and service frequencies will mean that bus patronage is likely to remain low.

Local facilities in the village, including the shop, post office, school and GP surgery all involve a walk distance of between 1.2km and 1.8km, well beyond recognised desirable and acceptable walking distances. Due to the location of the site, these walking distances are generally 400m longer than equivalent journeys from the approved Phase 1 development; taking them beyond acceptable distances for many people.

In view of these points, the development fails to comply with NPPF paragraphs 110(a) and 105. It also conflicts with Policy GEN 1(e) by failing to encourage movement by means other than driving a car.

## MAIN ISSUE 4 – TRAFFIC IMPACTS

Traffic conditions in Stanstead Mountfitchet are already unacceptable and will further worsen with committed development. The piecemeal approach to planning in this area, with successive individual applications and appeals, has resulted in an incremental growth in traffic to the point where the cumulative impacts can no longer be satisfactorily accommodated. A further 200 houses on this site would result in severe cumulative impacts, contrary to NPPF paragraph 111 and Policy GEN1(b). The position would be even worse, taking into account the proposed 130 dwellings on the adjoining site South of Henham Road.

The applicants and indeed the decision-makers for several previous planning applications, have placed great reliance on the use of Vissim modelling. Whilst such models can provide useful comparative data to inform the decision-making process, they should never be relied upon as the sole basis for decisions.

As demonstrated in this case, the modelling does not reflect the day-to-day experience of residents. It presents an optimistic, 'best case', picture underpinned by the assumption that traffic conditions are always stable, gridlock never happens and that drivers always adhere to courteous behaviours.

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There are notable differences between the current WSP model and the version used for the Phase 1 development at the 2020 planning appeal. The current model considers a 2027 assessment year but reports shorter queues than were shown for the 2023 assessment year in the previous model, despite the lower levels of committed and proposed development under consideration at that time. This is counterintuitive and further reinforces the point that the current model is portraying an unrealistic, best-case scenario.

This inconsistency has also been highlighted in Essex County Council's latest consultation response of 5<sup>th</sup> Dec 22. The modelling review report attached to the ECC consultation also raises a number of serious concerns about the current model, which remain outstanding.

A further consideration is that there are marked differences between the WSP model results and those from the Vissim model developed by consultants acting for the adjacent development south of Henham Road. The latter showing very different results with forecast queue lengths typically 10 to 15 times greater than the WSP model. These contrasting and inconsistent results further confirm that the Vissim modelling cannot be relied upon to give a true reflection of current or future traffic conditions.

The highway network in Stansted Mountfitchet is highly constrained with very limited scope for mitigation. The proposed 2<sup>nd</sup> queue detector was examined in detail at the 2020 planning appeal and shown to offer little overall improvement; reducing queues in one location at the expense of increasing them elsewhere. The scheme is designed to enable a small reallocation of the amount of 'green time' at each end of Grove Hill, under certain traffic conditions, but does nothing to improve the core problem which is its narrow width, which leads to blockages of the carriageway and over-running of the narrow footways. At best it will slightly increase traffic throughput at certain times of the day, but will not and can not solve the underlying problems.

In any event, this planned scheme has been secured by and for committed developments; and any benefit would be consumed by those developments leaving no scope for mitigating the impacts of the current application.

Essex County Council is considering a feasibility study into reducing HGV traffic through Stansted Mountfitchet through better enforcement of the current weight restriction. However, pending such studies, there is no certainty that any material improvements are possible, or that they would be sufficient to mitigate the adverse impacts of the proposed development.

The only mitigation offered by the developer is a Residential Travel Plan, which seeks to promote a 10% reduction in single occupancy car trips, but again, there is no certainty this could be achieved or sustained in the long term. Even if it could, it would have a minimal effect on overall traffic generation and would not be sufficient to off-set the adverse cumulative impacts of traffic.

For all the above reasons, the application should be refused.