

Section 62A Planning Application: S62A/22/0006
Berden Hall Farm, Ginns Road, Berden

The Planning Inspectorate Hearing
on 9th March 2023

Review of Traffic and Highway Considerations

by Sara Yarrow

My name is Sara Yarrow and I have lived near to the site all my life.

I would like to outline several reasons why this planning application should be refused in relation to traffic and highways matters which are highly significant.

My comments are based on version 2 of the Construction Traffic Management Plan. It does seem extraordinary that the Applicant has been permitted to submit version 3 of this report which has not been drawn to the public's attention until the Public Hearing today. I have had the briefest of read of this document but there is no way I can assimilate the information that it contains on a mobile phone in the space of a few minutes and assess the impact for you today, I have tried to rewrite my script today, so please forgive me for my stumbles

However, whatever amendments have been made in the 3rd version of the CTMP cannot detract from the fact that this is a huge development and the construction traffic required will have a massive impact on the fragile road network and local residents of the area.

Regardless of what Version 3 states, it does not detract from my first reason.

1. A letter sent by the Director of Essex County Council's Highways and Transportation Department to The Planning Inspectorate ¹

***FACT** : This letter confirms that the proposal is contrary to the Highway Authority's Development Management Policies and is **not** acceptable.*

Therefore, before the hearing, in light of the information in Version 2, the Application is fundamentally flawed.

2. Failure to Assess Impact on Public Rights of Way ³

***FACT** : There is a substantial network of rights of way in and around the site that are regularly used by local residents.*

In version 2, the Applicant failed to acknowledge that the proposals have a direct impact on these footpaths. There had been no work undertaken to demonstrate how the construction works can progress without putting members of the public at risk.

In version 3, the applicant has suggested various changes to the rights of way, it is impossible to assess this at such short notice. No diversion of a footpath will detract from the fact that the applicant is proposing an industrial development into a rural area which will have a huge impact on local footpath users.

3. Failure to Assess Sensitivity of the Construction Route ³

***FACT** : The applicant has change the route in version 3. The route to the site now goes through Newport, Clavering and Berden. The proposed return route passes through Beren, Manuden and Hazel End. All routes are used by*

cars, cyclists, pedestrians and equestrians. The villages have areas of on-street parking, narrow or no footways, tight bends with restricted forward visibility and roads so narrow in places that cars can only pass in single file, with extreme care and at low speed.

In version 2 of the CTMP, the Applicant falsely claimed that traffic will cause no significant impact on road users. I assume they have changed the access at the last minute because this is not the case. It now passes through Newport, a village with existing extreme traffic issues and past the primary school in Clavering.

In Version 3, the applicant have still not even acknowledged the existence of a primary school in Manuden or the Village Hall in Berden, both which have significant movement of vulnerable highway users with limited or no access to public footpaths.

4. Absence of a Transport Statement ³

FACT : A review of the Crashmap website ² reveals twelve personal injury road traffic accidents (PIAs) along the route between the A120 and the site over the past five years. This information provides further evidence that the route is not suitable for use by significant numbers of HGV vehicles.

In version 2, Applicant has failed to provide the required Transport Statement or Highway Safety Assessment to assess the acceptability of the revised route.

In version 3, the applicant proposes erecting warning signs and reducing the speed limits, these are just sticking plasters on routes that are already fundamentally compromised.

5. Failure to Provide Accurate Trip Generation Data ³

FACT : An independent traffic consultant has calculated that the number of vehicles needed for all construction equipment, solar panels and associated infrastructure, removal of topsoil etc is likely to be around 1,035 HGV movements over the 6 month construction period.

In version 2, the Applicant falsely estimates that there will be 350 HGV movements which is only one third of the true figure. It has not detailed any breakdown or schedule of movements which is a planning requirement.

IN version 3, the application has increased these figures, I have not had time to assess them.

6. Other Critical Omissions

FACT : Details of the construction compound including its location and safety arrangements for pedestrians in this compound and on the public rights of way are required.

In version 2, the Applicant failed to provide this information.

I have not read this section in version 3

7. Failure to Consider Cumulative Impact ³

FACT : *There are current planning applications for two Battery Energy Storage Sites and one additional Solar Farm in the vicinity.*

In version 2, the Applicant has not made any reference to any of these major developments in any of the highways and transport information that has been submitted.

In version 3, they state “ this application could therefore result in cumulative impacts if constructed at the same time’.

Of course this is true, but even if the developments were to be constructed concurrently, and the construction period was therefore 12 months, the impact of these proposals on traffic and highways remains unacceptable. It is not clear what additional steps the applicant will put in place should there be construction traffic on our local roads for a one year period.

CONCLUSION

I believe that is utterly unacceptable that the Applicant should be allowed to submit a revised Construction Traffic Management Plan at this stage of the proceedings and that it should not be taken into your consideration without prior public scrutiny.

I urge you to refuse permission for this development on the grounds that the applicant has not provided sufficient or acceptable information on traffic and highway grounds for the proposed development.

1. Letter dated 22nd September 2022 from Director of for Highways and Transportation, Essex County Council
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1103644/Essex_County_Council_Highways_Redacted.pdf
2. <https://www.crashmap.co.uk>
3. See “Representation on Transport and Highways Matters on behalf of Local Residents”, commissioned by Protect the Pelhams. This has been prepared by Bruce Bamber of Railton TPC Ltd, a consultant with over 30 years of experience working within the transport planning industry for both private and public sector clients, including giving evidence at many informal hearings and planning enquiries.
<https://www.gov.uk/guidance/section-62a-planning-application-s62a220006-berden-hall-farm-qinns-road-berden-additional-documents>

