

## Comments on '1 Applicant Response to PINS 5 Dec 2022'

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### INTRODUCTION

WSP, the transport consultant acting for the Applicant, has submitted comments in response to the November 2022 Transport Objections report submitted by Henham Parish Council. These were uploaded to the PINS website on 05/12/22 in a document referenced '1 Applicants response to PINS 5 Dec 2022'.

This note provides a response to the points raised in the WSP Notes. The same paragraph reference numbers have been retained for ease of reference.

### RESPONSE

#### Para 2.4

Our concerns about the omission of the Vernons Close site from the WSP analysis; and the conclusion reached in Para 2.4 remains. We note the same omission has been raised as a concern in item 1c of the latest Essex County Council consultation response letter (5 Dec 2022).

#### Para 2.5

The inclusion of the 130 dwellings South of Henham Road within WSP's sensitivity test is not in dispute. That point is noted in SWTP's Para 2.5 (and elsewhere). This does not affect or diminish any of the concerns raised in respect of the WSP Vissim modelling.

#### Para 2.7

The previous Local Plan Inspector's comments on sustainability remain valid regardless of other subsequent planning decisions.

#### Para 2.8 – 2.18

Traffic congestion in Stansted Mountfitchet remains a key concern and the comments in Paras 2.8 – 2.18 remain valid. A point also emphasised in the latest Essex County Council consultation response letter (5 Dec 2022).

#### Para 2.23 – 2.24

Comments and concerns about the limitation of the modelling remain. The current modelling introduces new areas of concern as set out in the Parish Councils objections and in the latest Essex County Council consultation response letter (5 Dec 2022).

#### Para 2.25 – 2.31

Our concerns about the relevance of modelled average queues remain, for the reasons set out in Paras 2.25 - 2.31

#### Para 2.32

Our opinion regarding the reliability of the modelling remains, and is based on the evidence presented in the WSP results. The Parish Council does not have the resources to commission the building of an independent Vissim traffic model; hence relies on the data presented by the Applicant (and indeed the conflicting modelling results from the South of Henham Road Vissim model). For the avoidance of doubt SWTP has extensive experience of traffic modelling despite not having an in-house modelling team. As a small practise, such work is managed through a sub-contractor when required.

#### Para 2.35 onward

The comparison between WSP and Ardent modelling is directly relevant to the consideration of this application. The two models have the same base year and assessment years and cover the same highway network. They both contain development scenarios which are directly comparable and should yield very similar results. The huge differences between them underlines the limitations of the modelling process (in this case) and the minimal weight that should be given the results.

#### Para 3.1 onward

The current site is more remote from local services, than was the case with the Phase 1 development; all of the destinations in Table 1 (para 3.2) involve greater walking distances. Only the rail station is closer.

Points relating to sustainability were not conceded in cross-examination as incorrectly asserted by WSP. The Inspector for the Phase 1 development reached the conclusion that local services were adequate in relation to that site. A separate appraisal is needed for this current application.