

From: [REDACTED]

Sent: 07 January 2024 18:43

To: [REDACTED] Section 62A Applications

<section62a@planninginspectorate.gov.uk>

Subject: OBJECTION TO S62A/22/0006 Berden Hall Farm, Ginns Road, Berden (Redetermination)

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Dear Sir

S62A/22/0006 Berden Hall Farm, Ginns Road, Berden (Redetermination)

I would like to object in the strongest possible terms to the above development. In particular I would like raise concerns on the Construction Traffic Development Plan (CTMP) version 3.

This was submitted by Statera just before the Hearing on 9th March 2023, which did not allow the public any time to comment. I would like to submit comments on the CTMP now, for the first time, for consideration during the redetermination of this application.

Protect the Pelhams commissioned Bruce Bamber, Director of Railton TPC Ltd. (who has over 30 years of experience working within the transport planning industry for both private and public sector clients) to assess this Plan. I attach it to this email for you to read.

In summary, he has highlighted the following concerns:

- **Inadequate Assessment of Transport Impact**
- **Lack of transparency in the Trip Generation Data**
- **Other Omissions from CTMP**
- **Failure to Consider Cumulative Impact**

The summary and conclusions of this report are as follows :

1 Railton TPC Ltd has been instructed by local residents to make a further representation dealing with transport and highways matters in relation to a planning application for a ground mounted solar farm with a generation capacity of up to 49.99MW, together with associated infrastructure and landscaping at Berden Hall Farm, Ginns Road, Berden. This representation is prompted by the applicant submitting a third revision of the CTMP that differs in several fundamental ways to the earlier two versions.

2 Local residents are concerned that the construction of the proposed development may lead to significant adverse transport impacts and this concern is amplified by the fact that this is only one of several major local developments, all of which have the potential to lead to significant adverse transport impacts.

3 *It remains a concern that the CTMP does not appear to have been prepared by any recognised transport or highways specialist. None of the versions of the CTMP are either attributed or dated. No versions demonstrate proper understanding of conventional approaches to transport impact assessment and environmental impact assessment. Assumptions are not supported by evidence, sensitive receptors and classes of vulnerable highway user such as equestrians are not assessed, records of highway safety are not considered and proposed mitigation measures are not subject to the level of scrutiny that would normally be expected.*

4 *The deficiency of the CTMP is exacerbated by the fact that no Transport Statement has been produced despite this being an initial requirement. Further, in the initial EIA Screening process, the applicant failed to acknowledge the sensitivity of the proposed construction route.*

5 *The latest proposed construction route passes through Manuden, a sensitive village with on-street parking, narrow and absent footways, tight bends with restricted forward visibility and a primary school associated with significant movement of vulnerable highway users during school opening and closing times. The route through Manuden has been deliberately avoided by the promoters of the Pelham Spring development because of the high sensitivity of the primary school.*

6 *The latest strategy seeks to implement a circular one-way route. Although this will reduce the risk of construction vehicles meeting each other, it also means that construction vehicles will pass through Clavering including sections of narrow carriageway bordered by narrow footways and Clavering Primary School and through Newport including the highly constrained High Street/Wicken Road junction. The inward route to the site from the A120 is twice the length of the outward route. There will therefore be strong pressure on drivers to ignore the one-way system and the applicant provides no convincing evidence to suggest that compliance with the system can be guaranteed.*

7 *Two-way construction traffic is proposed along the section of Ginns Road between the site access and Manuden Road. In Berden, the construction route passes the Village Hall that is accessible from the village only by walking along a narrow section of carriageway with no footways or verges with a blind bend at one end and a blind crest at the other. The applicant is now proposing shuttle working over a 150m section of Ginns Road through the centre of the village. It appears likely that the proposed arrangement will not be safe since there will be several private drives accessing Ginns Road between the signals and drivers leaving the properties will not know which direction has priority, an issue exacerbated by the very tight bend that blocks visibility. The proposed mitigation cannot, therefore, be relied upon to overcome the potentially severe highway safety impact of construction traffic.*

8 *There have been twenty personal injury road traffic accidents (PIAs) including eight serious PIAs along the part of the route from Newport to the site and from the site to the A120 over the past five years. Three of these are recorded within Manuden village and three on the section of road to the north of the village. There have been two serious PIAs in Clavering and three serious PIAs in and to the west of*

Newport. This information has not been used to inform any part of the CTMP.

9 Although the applicant now provides some further information about trip generation there remains a lack of transparency in the approach that has been adopted. There remain significant uncertainties and it appears that the calculation both omits traffic associated with the construction of significant elements of the development and adopts assumptions that are inconsistent with those adopted in relation to other local development proposals.

10 Including this proposal, there are four major developments in the relatively small area south of Berden, all of which are likely to generate a similar level of HGVs during construction. The applicant suggests that an agreement can be reached whereby all the developers coordinate construction timetables, HGV routes and operational schedules. No other developer has suggested such an arrangement. It is highly unlikely that any such agreement could be reached and any Condition requiring this to happen would be both unenforceable and unreasonable. The applicant provides no evidence that there have been any discussions about coordination. No reliance should be placed on the proposal and the very important issue of cumulative impact must remain a major source of uncertainty and concern.

Overall, it is concluded that the latest CTMP fails to compensate for the lack of any comprehensive and systematic Transport Statement or transport environmental assessment. There remain serious concerns about the impact on vulnerable highway users and local communities and the key proposed mitigation measures in the form of shuttle working through Berden Village and a speculative agreement with those responsible for other major local development proposals do not stand up to scrutiny and should not be relied upon to overcome major concerns about highway safety and cumulative impact.

For these and many other reasons, I sincerely hope that you will refuse permission for this development.

With kind regards

Sara Yarrow