



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

Representation on Transport and  
Highways Matters on behalf of Local  
Residents

(Third Revision of CTMP)

## **Railton TPC Ltd**

41 York Road  
Newbury  
Berkshire RG14 7NJ

T.   
E. 

Railton TPC Ltd ref:	Berden Hall Farm March 2023 A
Planning Inspectorate	Ref: S62A/22/0006
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Author:	Bruce Bamber BSc MA MSc MCIHT

## **Table of Contents**

1 Introduction.....	1
2 Inadequate Assessment of Transport Impact.....	3
Failure to Assess Sensitivity of Construction Route.....	3
Absence of Highway Safety Assessment.....	9
3 Trip Generation Data.....	11
4 Other Omissions from CTMP.....	13
5 Failure to Consider Cumulative Impact.....	14
6 Summary and Conclusion.....	16

## 1 INTRODUCTION

- 1.1 Railton TPC Ltd was initially instructed by local residents to make a 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 was submitted to the Planning Inspectorate (PINS) in September 2022.
- 1.2 A further representation (February 2023) was prepared in response to a revised Construction Traffic Management Plan (CTMP) (Rev. 2, unattributed and undated) that proposed a change in the route to be taken by construction traffic.
- 1.3 A third CTMP (Rev. 3, unattributed and undated) has now been submitted by the applicant with a number of revisions. This third CTMP is reviewed in the following sections. Where previous issues and concerns remain, they are included in this representation to avoid the need to refer back to earlier versions.
- 1.4 The author of this report is 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. He has dealt with the transport and access arrangements for development schemes comprising all land use types and at all scales. He has been involved with numerous local and strategic transport studies and modelling exercises. He has given evidence at many informal hearings and public inquiries, participated in Local Plan Inquiries and at a DCO Hearing. He is a Chartered Member of the Institution of Highways and Transportation and has a Masters Degree in Transport from Imperial College, London.
- 1.5 There have been a number of planning applications made in the local area over recent years for developments that would fall within the Schedule 2 category of '*Industrial installations for the production of electricity, steam and hot water*' as set out in the 2017 Environmental Impact Assessment Regulations. Local residents have not only been concerned about the failure to properly assess the transport and highways impacts of construction traffic associated with each proposed development but also about the potential **cumulative** impact of developments (see **Section 5** below).

- 1.6 Railton TPC Ltd has previously reviewed transport submissions associated with a number of the proposed local developments. The author is therefore familiar with the sensitivities of the local transport networks.
- 1.7 Uttlesford District Council (UDC) Planning Authority is currently in 'Special Measures' and this planning application is being considered by the Planning Inspectorate under Section 62A of the Town and Country Planning Act (1990).
- 1.8 The information submitted by the Applicant that informs this representation is available on the GOV.UK website. The key transport documents are the Access Technical Note (Miles White Transport (MWT), 17 December 2021), the Environmental Statement (RPS, November 2022) and, as described above, the Construction Traffic Management Plan (CTMP) (Rev. 3, unattributed and undated).
- 1.9 The following sections provide details of the following errors and omissions in the transport supporting information:
- Section 2: Inadequate Assessment of Transport Impact
  - Section 3: Trip Generation Data
  - Section 4: Other Omissions from CTMP
  - Section 5: Failure to Consider Cumulative Impact
- 1.10 A summary and conclusion is provided in **Section 6**.

## 2 INADEQUATE ASSESSMENT OF TRANSPORT IMPACT

### Failure to Assess Sensitivity of Construction Route

- 2.1 Previous representations pointed out that the applicant has been at fault in relation to the response given to Question 9.2 of the initial Environmental Assessment Screening Matrix; *'Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?'*. The applicant gave the answer 'No' with the explanation, *'The main highways routes surrounding the site are not susceptible to any existing congestion'*. No comment was made with regard to *'or which cause environmental problems...'*.
- 2.2 It is self-evident that the routeing of construction traffic is highly problematic since the applicant has now proposed three different traffic routeing strategies. Rather than acknowledging, at the outset, the potential environmental impact of construction vehicles on sensitive country lanes, the applicant has opted to submit a series of varying CTMPs reacting to comments and objections. At no point has the applicant produced any information to demonstrate that a systematic and comprehensive transport environmental impact has been undertaken.
- 2.3 The most recent (Rev. 3 CTMP) comprises an anticlockwise 'one-way' routeing system incorporating, from the A120, the B1383 to Newport, the B1038 through Clavering and Manuden Road through Manuden to return to the A120. Construction vehicles are proposed to travel in both directions along the section of Ginns Road through Berden between the site and the anticlockwise 'circular' route.
- 2.4 From the A120, the route to the site via Manuden has a length of around 11km. The route via the B1383, Newport and Clavering has a length of around 22km. The route via Manuden will be significantly more attractive to drivers, particularly if they are using this part of the route for the return journey in any case. It is likely to be difficult to enforce compliance with the proposed routeing strategy. The CTMP provides no convincing measures to minimise the risk of some drivers failing to comply.
- 2.5 The applicant proposes signage and a reduction in speed limit to mitigate the adverse impact of heavy vehicles using the low standard road between Ginns Road south, through Manuden. Although the proposed one-way system is intended to avoid construction vehicle meeting each other, it will not eliminate the risk of heavy vehicles meeting other cars or larger vehicles. Sections of the road are as little as 4.0m in width,

insufficient to allow an HGV to pass a car and highly dangerous if an HGV passes a cyclist or equestrian.

- 2.6 Particularly narrow sections of carriageway are present at Hazel End, and approximately 2km north of Manuden although there are long sections of highway with no central white lines suggesting widths insufficient to allow two light vehicles to pass except at low speeds. There is frequent evidence of cars over-running verges and embankments along narrow sections of carriageway:

**Photo 1:** Section of narrow carriageway looking north (2km north of Manuden) showing clear signs of vehicles over-running embankments



- 2.7 Previous iterations of the CTMP included images of the proposed construction route derived from Google Maps. No photographs of pinch-points and sensitive areas are included in the latest version. The text of the CTMP refers to carriageway widths '*generally 5m to 5.5m*' along the construction route. It appears that the applicant has not undertaken a proper review of the standard of the route, particularly those narrow sections below 5.0m in width where the passage of HGVs is most likely to lead to safety and environmental problems.
- 2.8 The route is used by equestrians as evidenced by warning signs. Any significant increase in vehicle flows, particularly HGVs will have an adverse safety impact on equestrians. The applicant has had the opportunity to consider the impact of the works on this vulnerable group but the latest version of the CTMP makes no mention of equestrians.

- 2.9 Manuden is particularly sensitive to changes in traffic flows. The road through the village is narrow in places and frequent on-street parking reduces the effective width available for vehicles to pass. Footways are narrow or absent in places and vehicles are observed to be pulled up onto footways in order to maintain sufficient space for passing vehicles:

**Photo 2:** The Street in Manuden looking North showing vehicles parked on Footways



- 2.10 Forward visibility is constrained by tight corners and buildings close to the highway edge. Many properties' front doors open directly onto narrow footways and are thus very close to the highway edge. Neither the CTMP nor the Environmental Statement undertake any assessment of the potential impact of construction traffic on those living in and moving around Manuden.
- 2.11 A primary school is located adjacent to The Street in Manuden. There are significant numbers of primary school aged pupils walking through the village, crossing the road and using narrow footways at school opening and closing times. Parents' cars line the road for some distance either side of the school during drop-off and before and during pick-up periods. The primary school represents a very sensitive receptor in transport environmental impact terms. The latest CTMP proposes restrictions on operating hours (09:30hrs to 15:00hrs) to avoid the start and finish times of the Manuden Primary School and the Clavering Primary School but fails to consider the fact that some parents arrive well before the end of the school day specifically because the parking situation around the schools is so constrained. No considerations has been given to pupil movements at other times. It appears that the applicant has not communicated with the schools to understand whether there would be other times when large construction vehicles would constitute a significant threat. The applicant has undertaken no assessment of the

issues that might be associated with large vehicles negotiating the other constraints within Manuden.

- 2.12 The CTMP that has been submitted in support of the Pelham Spring Solar Farm development<sup>1</sup> (App. Ref. UTT/21/3356) that lies to the south of the Berden Hall Farm site states:

*'The routes identified [...] will ensure that construction vehicles associated with the site will not pass through Manuden and Berden villages and are kept on motorway or 'A' and 'B' roads as far as possible. This is preferable because Manuden Primary School is located immediately adjacent to 'The Street', which would form part of the construction route if vehicles were to be routed via Manuden'* (Pelham Spring CTMP, para. 4.3).

- 2.13 The high sensitivity of Manuden (and Berden) to construction traffic was therefore clear to the promoters of the Pelham Spring development and significant effort has been made to ensure that no construction traffic passes the Manuden school. This is further evidence that the Berden Hall Farm proposals are likely to lead to an unacceptable impact on Manuden.

- 2.14 In Berden, the Village Hall is located adjacent to the construction route. The only pedestrian route to and from the Village Hall for the vast majority of local residents is along a 75m section of carriageway of Ginns Road east of the junction of The Street with Ginns Road.

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<sup>1</sup> CTMP, Pelham Spring Solar Farm, Pegasus Group, Sept.2021



**Photo 3:** Village Hall in Berden looking west showing section of narrow carriageway with no footways and tight bend



2.15 This road is proposed to be used by all heavy vehicles accessing the site. The Village Hall is used during the day for meetings of the home schooling group and accompanied children walk between the Village Hall and the recreation ground to the west. The section of carriageway is particularly hazardous for pedestrians since there are no footways and no verges, there is a crest in the road to the east that limits forward visibility for drivers approaching from this direction:

**Photo 4:** Section of narrow carriageway between Village Hall (just visible on left) and village showing blind crest



- 2.16 There is also a tight bend at the western end of this section of highway that severely limits visibility:

**Photo 5:** Tight bend in centre of Berden looking east



- 2.17 Drivers approaching the narrow section of carriageway with no footways that provides access to the Village Hall from both directions are therefore subject to sub-standard forward visibility that puts vulnerable highway users at risk. This is a highly sensitive location subject to great potential highway risk.
- 2.18 The latest version of the CTMP considers this issue for the first time. Neither of the previous two CTMPs acknowledged the existence of this highly sensitive area and mitigation is now proposed in the form of 150m of signal controlled shuttle working (page 8 of CTMP Rev. 3). This is another example of the applicant adopting a reactive rather than proactive approach to dealing with transport environmental impact.
- 2.19 The applicant fails to consider the fact that there will be several driveways within the area controlled by shuttle working. Drivers emerging from these driveways will be unable to see which direction has priority and may turn into the path of oncoming traffic since signal heads are not visible to them and the tight bend in the centre of the shuttle working obstructs visibility of oncoming vehicles. The applicant has proposed a measure that has not been properly considered and may well be unworkable for road safety reasons.

2.20 The latest route passes through Clavering and passes the Clavering Primary School (yrs 1-6) that is accessed by many parents and children on foot as well and numerous parents in vehicles that lead to significant lengths of the adjacent carriageway becoming congested and, in places, reduced to single lane operation. The route also passes Clavering Village Hall that hosts a number of daytime activities including some for parents and toddlers. A section of carriageway in the centre of the village immediately north of the Fox and Hounds public house has a width below 5.5m and as little as 4.9m and is thus of insufficient width to allow two HGVs to pass. On one side is a steep ditch and on the other a narrow footway that reduces to as little as 1.0m. The applicant suggests that the constraints in the centre of the village can be overcome by signage warning of possible oncoming HGVs. This does not overcome the problem faced when an HGV meets a car or larger vehicle on the narrow stretch of road and is unable to pass or only able to pass by over-running the adjacent narrow footway. The CTMP does not consider the safety of pedestrians who might be using the narrow footway in this area.

2.21 The route joins the B1083 in Newport at the High Street/Wicken Road junction in the centre of the village. This is a highly constrained junction with narrow footways, tight kerb radii and high pedestrian flows. The junction has a poor safety record and is the subject of requests from local residents to Essex County Council Highway Authority to implement measures to improve safety. Large vehicles have difficulty turning into and out of the junction. An HGV is unable to turn left into the junction from the B1383 when any vehicle is waiting on the B1083 to turn out of the junction. The junction is crossed by many pedestrians since it is adjacent to the main shops in the centre of the village and forms the main route between the school and the railway station. Any pedestrian standing on the southern side of the junction is at risk when an HGV is turning left into Wicken Road. No assessment has been undertaken to establish whether the types of vehicles expected to access the site during construction can safely turn into the junction and what impact these movements could have on pedestrians.

2.22 The section of Wicken Road (B1038) in Newport is subject to significant on-street parking that reduces the road to single lane operation.

#### Absence of Highway Safety Assessment

2.23 There has been no assessment of highway safety along the proposed construction access route. A review of the Crashmap website reveals twenty personal injury road

traffic accidents (PIAs) over the past five years along the part of the route from Newport to the site and from the site to the A120. Eight of these PIAs are recorded as serious. Three PIAs 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.

### 3 TRIP GENERATION DATA

- 3.1 In previous representations it was pointed out that no details of trip generation were provided. The latest version of the CTMP provides some additional information.
- 3.2 Previously it was assumed that construction would generate 350 HGV deliveries. That number has now increased to 660, almost doubling the estimate set out in both the first and second CTMPs.
- 3.3 The latest CTMP considers the trips associated with access tracks, fencing materials and the solar panels and associated mountings and equipment. No allowance is made for the import and export of construction equipment, geotextile membrane to underlie tracks, concrete for hardstanding, substation components, the connection compound, spares containers, materials and equipment associated with landscaping and the potential export of topsoil removed from access tracks and compound areas.
- 3.4 The applicant needs to provide a comprehensive list of HGV generators if the figures within the CTMP are to be relied upon.
- 3.5 The CTMP submitted in relation to the Pelham Spring Solar Farm provides a calculation of the number of large HGV movements associated with the import of the solar modules and mounting structures based on information supplied by Low Carbon, the applicant. Low Carbon's website states that the company, '*has an established track record and a growing pipeline of large-scale projects in development*'<sup>2</sup> It can therefore be assumed that the calculation is based on the practical experience of constructing solar farms. Low Carbon expects that around 15 large articulated vehicle deliveries will be required to install every MW of power. The latest Berden Hall Farm CTMP, however, states, '*Statera Energy experience from other similar sites identifies that development of a Solar Farm requires approximately 10 HGV loads per MW of power generation*' (page 4). This is a significant difference and needs to be explained if the data are to have credibility.
- 3.6 Scrutiny of the proposed site layout reveals the need for at least 2.3km of access roads within the site. It is proposed that 0.1m of topsoil is removed and 0.2m of aggregate imported to form a compacted base. The site plan indicates that the internal tracks have a width of 4.0m. A simple calculation reveals that these works will be associated with the export of 920m<sup>3</sup> of topsoil and the import of 1,840m<sup>3</sup> of aggregate. Assuming topsoil typically has a density of 1.4 tonnes/m<sup>3</sup>, a total of 1,288 tonnes of topsoil would be

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2 <https://www.lowcarbon.com/development/uk-solar-development/>

removed. Assuming aggregate has a density of 2.4tonnes/m<sup>3</sup>, a total of 4,416 tonnes of aggregate would need to be imported. The overall total weight of material leaving and entering the site would therefore be 5,704 tonnes. The typical capacity of a large tipper truck (8 wheel) is 20 tonnes. The total number of HGVs needed to transport this material would be 285 (5,704 divided by 20). This is more than double the unsupported assumption of 140 HGVs associated with access tracks and fencing set out in the CTMP (page 4). If the applicant has undertaken any calculations of HGV generation, these need to be set out so that they can be checked for reliability.

#### 4 OTHER OMISSIONS FROM CTMP

- 4.1 It has already been noted that the statement of HGV trip generation included in the CTMP is not supported by calculations, source data or underlying assumptions. Scrutiny of the information that has been submitted reveals a number of further errors and significant omissions, some of which are described below.
- 4.2 No information is provided to show where the construction compound will be located.
- 4.3 The CTMP does not include the plan of the construction compound. A plan is submitted separately but this does not include any minibus spaces despite the CTMP stating, '*A temporary car parking area (including spaces for minibuses and vans) will be provided within the on-site contractor's compound*' (CTMP, p.4).
- 4.4 The plan showing the construction compound indicates an 'unloading area' although no information is provided to show which areas would be used for the storage of materials and how large vehicles would be able to safely manoeuvre in and out of the compound. The unloading area is shown between staff parking and staff facilities. There appears to have been no attempt to separate operational activities such as loading and unloading from pedestrians movement. Despite this, the CTMP states, '*A temporary compound area will be established next to the site access with this being of a sufficient size to accommodate welfare facilities for the workforce, parking for workforce vehicles, secure storage of materials and the unloading requirements of the delivery vehicles.*' (CTMP, p.11).
- 4.5 The Introduction of the CTMP states that, '*the [CTMP] covers some of the detail that would be expected within a Transport Statement*' (Rev. 3 CTMP, p.2). Given that the document is unattributed, it is not possible to judge whether the author is qualified or sufficiently experienced to prepare a Transport Statement. The Applicant has not submitted a Transport Statement despite this being identified as a requirement by UDC in the Screening Response. The Access Technical Note is limited to details of the access junction and the highway safety record.

## 5 FAILURE TO CONSIDER CUMULATIVE IMPACT

- 5.1 The UDC Screening Response requires the development *'to be considered in relation to similar applications that are currently being assessed for solar farms by the Local Planning Authority. These include application UTT/21/0688/FUL- Land At, Cole End Farm Lane, Wimbish and application UTT/21/2846/FUL- Chesterford Park, Little Chesterford, Essex'* (Screening Response, p.2). These developments are not referred to by the Applicant in any of the transport supporting information that has been submitted.
- 5.2 There are further planning applications that have been submitted but yet to be determined in the local area that have the potential to generate significant numbers of HGV movements. These include:
- 3/21/0969/FUL(E Herts.): Proposed Battery Energy Storage Site: Land At Greens Farm East End Stocking Pelham Buntingford Hertfordshire SG9 0JU (immediately south-west of the Berden Hall Farm site);
  - 3/22/0806/FUL (E Herts.): Proposed Battery Energy Storage System and associated infrastructure: Land off Crabbs Lane and Pelham Substation Stocking Pelham Herts (immediately west of the Berden Hall Farm site);
  - UTT/21/3356 (Uttlesford): Proposed 49.9MW Solar Photovoltaic Farm with battery storage at Pelham Spring (immediately south of the Berden Hal Farm site).
- 5.3 Representations made in relation to the first two planning applications on behalf of local residents in July 2022 (Railton TPC Ltd letter dated 15/07/2022) set out calculations that indicated that, in cumulative terms, the transport impact could be around 32 additional HGV movements if the developments came forward simultaneously or 16 additional daily HGV movements if the developments came forward sequentially but with the construction period correspondingly doubled. The Pelham Spring development predicts a similar level of daily HGV trip generation (16 HGV movements per day) and it is likely that the Berden Hall Farm development would add in the region of a further 16 daily HGV movements. If all development came forward simultaneously they would generate around 64 HGV movements per day on the local highway network or if they were to come forward sequentially the total period over which HGVs would be using the network would be quadrupled.



- 5.4 There is clearly strong evidence to show that there is significant potential for adverse cumulative transport impacts arising from the four large developments being proposed for a relatively small area south of Berden.
- 5.5 The applicant has now included in the CTMP Section 7 dealing with cumulative impacts. The applicant proposes that, '*Statera Energy initially engage in dialogue with the other Developers to identify their build programmes and, if shown to overlap, that a joint 'Road Booking System' be implemented*' (page 15). No evidence is provided to indicate whether any approaches have been made to other developers in the area. It is highly unlikely that other developers will wish to alter their construction timetable, construction routes or operations schedule to coordinate with Statera Energy. With just two developers involved, such an agreement would be highly challenging but with potentially four developers the task is likely to be almost impossible.
- 5.6 It would not be reasonable to introduce a Condition to require the applicant to reach agreement with other developers since the implementation of the permission would then be dependent on third parties and the Condition would not, therefore, be enforceable and, indeed, reasonable<sup>3</sup>. Each developer would, in effect, be 'held to ransom' by the other developers. It should also be noted that the type of agreement suggested by the applicant is not being suggested by the other developers. Any Condition that did not lead to the type of agreement suggested by the applicant would be worthless. In summary, the proposed mitigation is highly unlikely to be effective and there should be no reliance on it unless there can be confidence that meaningful discussions between developers can be concluded and an overall strategy agreed in advance of any works progressing.
- 5.7 The concern of local residents arises because of the potential for significant adverse impacts resulting from numerous major developments. It is exactly this failure to consider how to properly identify and manage adverse impacts that drives much local opposition to the schemes.
- 5.8 It remains the case that not one of the applicants associated with major local development proposals has undertaken an assessment of the potential for adverse cumulative transport environmental impacts. This is a significant failure and one that needs to be rectified before any serious consideration is given to any of these proposed developments.

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3 See <https://www.gov.uk/guidance/use-of-planning-conditions>

## **6 SUMMARY AND CONCLUSION**

- 6.1 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.
- 6.2 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.
- 6.3 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.
- 6.4 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.
- 6.5 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.
- 6.6 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.

- 6.7 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.
- 6.8 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.
- 6.9 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.
- 6.10 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.

- 6.11 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.