

Dear [REDACTED],

I attended the PINS hearing regarding the above planning application on the 9th of March. The applicant submitted a third revision of their proposed transportation route only two days before the hearing and after comments had closed with no notification to interested parties. This route has not had proper public consultation and therefore should not be considered part of this planning application.

I have grave concerns about the safety of this third proposed route and feel that proper scrutiny has not been achieved and the safety of the public and especially school children, their siblings and parents is at considerable risk. Given the short time Essex Highways had to respond to this new submission I believe the dangers should be revisited and reassessed.

There are many schools that will be affected along the route, three of which are reduced to single lane passing at drop off and pick up times, often extended due to before school clubs starting at 7.30am, after school clubs, finishing at 6.30pm and lunch time collections 12pm and 1.15pm. One home schooled group is placed at a very narrow point in Berden that has no pavement and high verges on both sides by the Village Hall which they use. In the Summer the group of children walk on the road daily, moving between the Village Hall and the village playground for recreation.

Statera propose to turn left off the B3183 in Newport onto the B1038 towards Clavering. This junction is narrow, often reduced to single lane traffic due to resident parking. Almost directly on the junction is a pedestrian crossing which is used by the children accessing the Joyce Frankland Academy secondary school (1000 pupils). As a local user of this junction I can only describe Newport as teeming with school children at the open and close of the school day, before 8am, when the school opens and beyond 3.30pm when the school day finishes and after school clubs begin. There are children crossing both the entrance to the B1038 and using the pedestrian crossing to access the local shop opposite. This creates an L shape busy pedestrian route at this junction.

With up to 86 HGVs per week using this junction, some of which will be over 16.2m long and may need to swing into the opposite carriageway to achieve the manoeuvre, moving into the oncoming traffic at the junction and into it on the B1038. How does Essex Highways propose to keep children of Uttlesford and those commuting from further afield by train, safe on their journey to and from school? Given the nature of the demographic here we know that the age group is less vigilant than others and therefore more vulnerable. The public use this crossing throughout the day. Elderly residents cross the road here to visit the local pharmacy adjacent to the shop after attending the doctors' surgery in Frambury Lane.

This route is the main route for local villages to access secondary schools both in Newport and Saffron Walden. It is a busy and congested junction. Delays will occur

meaning construction traffic will likely be arriving later than stated outside other constraint points on the route.

Newport Primary School, along with the busy doctors' surgery, is cited along Frambury Lane off the B1038. This junction is busy throughout the day with vehicles crossing the path of the proposed construction traffic at this point.

Clavering Primary School (378 pupils) and Clavering and Arkesden Pre-School (30 pupils) on the Stortford Road are also along the proposed route. This section of Stortford Road is reduced to single lane traffic at open and close of school and often beyond for school clubs as previously stated. Willows, early morning and after school club held at St Mary and St Clements church on the Stortford Road, runs from 7.30am with the children walking to the primary school when it opens and after school from 3.15 to 6.30pm. Children are moving between the school and the church throughout this time. Parents also park in the car park of the SPAR shop opposite. This means there are many children and their parents crossing the Stortford Road at this point.

Statera's "Typical Daily Profile of Construction Traffic Movements" p5 of 16 states "**Where possible**" traffic will be kept to 9.30am and 3pm in term time. With 3.15pm collection times at Clavering Primary, Clavering Preschool, Manuden Primary and Newport Primary construction traffic will coincide with the busiest collection times as parents gather early to secure a parking spot, as well as collect children from after school clubs.

If Essex Highways allows Statera to decide what is possible, surely Statera can argue that, in any case, it was not possible to keep their construction traffic to less busy times. Such as delays or closures on the M11. These closures often send M11 traffic up through Newport compounding the dangers.

How does Essex Highways propose to mitigate the dangers to children and their parents posed by the many large HGVs that will be needed to supply this application? Should they impose conditions, how do they propose to ensure they are carried out bearing in mind Statera have not complied with planning conditions in the past. If effective mitigation is not realistic then the obvious course of action is to reject Statera's CTMP v3 proposal.

Berden Village Hall is used by Berden Home School community 2 to 3 times a week. Essex Highways have suggested the potential of traffic lights along this narrow stretch, without pavement, to mitigate the dangers of up to 86 HGVs a week using this pinch point. I suggest that this still presents considerable safety issues and excessive delays to local pedestrians and traffic. HGVs idling, along with school and local traffic combined with school children and other pedestrians, cyclists and equestrians trying to continue with their day will be subject to increased air pollution as well as the normal dangers of road use.

The introduction of traffic lights at this point in the village could push traffic onto the protected lane through Little London which is single lane with only two passing

points. It is usually avoided by local traffic due to its narrowness and lack of passing opportunity. This lane is exceptionally rich in wildlife, including hares, deer, barn owls and badgers. How does Essex Highways propose to maintain the protection of this lane and its diverse wildlife from over use due to development traffic?

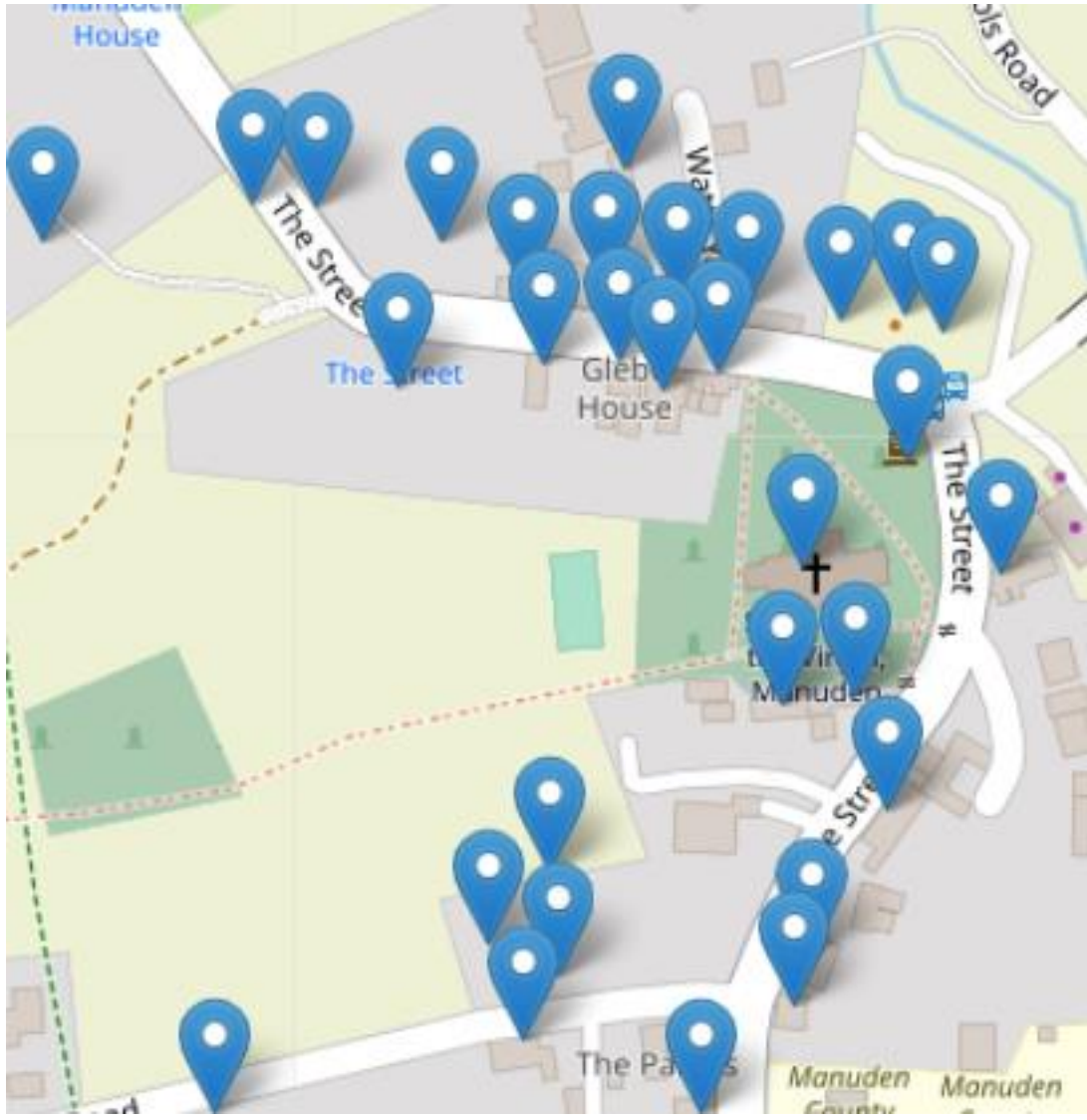
Manuden village has a narrow main street with listed buildings roadside. The pavements are narrow and used by local children, siblings and parents to access Manuden Primary School (80 pupils). The main Street is always single lane due to resident parking.

There is a 90 degree bend at The Yew Tree public house opposite the church. How does the applicant propose to achieve this bend safely with oncoming traffic without mounting or damaging pavements and property? What swing-out will 16.2m HGVs need? I believe this is termed "swept path analysis". I could find none in this third revision of their CTMP.

Manuden School is at the south end of the village. This point is also reduced to single lane traffic at busy times. Parents, children and smaller siblings, sometimes in car seats or pushchairs are exiting cars to access the school from 7.30am to 8.45am and again between 3.15pm and 5.15pm. With a large number, up to 86 HGVs a week, some of them more than 16m long, how does Essex Highways propose to ensure the safety of Manuden villagers, their children, and listed roadside buildings? The proposed hours of 10am-3pm 'where possible' look like a considerate gesture until you realise how busy the road is with families and children's activities during the day. Even if these restricted hours were enforceable they do not go far enough to reduce the risk posed by this type and weight of traffic on single lane roads.

Please see the map below that shows The Street and marked listed buildings, many of them roadside and vulnerable to heavy and wide traffic. What does Essex Highways propose to do to prevent potential damage to these heritage buildings with ancient foundations and street overhangs?







It is vital that Highway personnel deciding on mitigation or granting permission visit these points at their busiest times in order to be able to assess if any mitigation is possible or truly safe for our communities.

I believe I have demonstrated that public safety is at considerable, and I would argue undue, risk by the large number of HGVs that will be necessary to supply this development. Statera's table of proposed movements p5 of 16 CTMP Rev' 3, falls well within the busy school times. Our narrow streets and lanes are deeply unsuited to this kind of traffic and it poses grave danger to the safety of the public and potential harm to our heritage roadside listed buildings.

Large vehicles have damaged roadside properties in the past. Essex Highways should have record of this. Parked vehicles are regularly driven into or marked by passing traffic due to the narrowness of the street. Pavements are breached by vehicles when passing.

The figures I have used here, are those of the applicant themselves, however these figures fall short of the Bruce Bamber report, experienced Transport Consultant Director of Railton TPC Ltd on the PINS portal. May I bring your notice to point 2.18 page 8.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1137011/PTP_Response_to_ES_Appendix_6_Redacted.pdf

Absence of Highway Safety Assessment

- 2.18 There has been no assessment of highway safety along the proposed construction access route. A review of the Crashmap website reveals twelve personal injury road traffic accidents (PIAs) along the route between the site and 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. This information provides further evidence that the route may not be suitable for use by significant numbers of construction vehicles. The Applicant needs to undertake a proper assessment of highway safety along the route and if necessary, identify measures to mitigate potential adverse highway safety impacts, particularly in sensitive locations and areas with high concentrations of vulnerable highway users.

This report also points out that the cumulative affect of other applications currently in planning could quadruple the number of HGV journey's required to and from our villages. This is deeply concerning, we have already been witness to accidents and we can only conclude that this level of heavy goods traffic will increase the dangers greatly.

These routes are also proposed by Low Carbon for a similarly large construction of ground mounted solar panels adjacent.

S62A/2022/0011 Land East of Pelham Substation, Maggots End, Manuden

Thank you for your careful consideration on this. I am sure you take public safety very seriously and may even conclude that our narrow lanes and streets are not the kind of infrastructure, given their heavy and constant use by their communities, that is right for this level of construction traffic and "would be an unacceptable impact on highway safety" (NPPF 9. 111). Our communities stand to gain nothing from the development, yet be put in heightened danger.

Statera's CTMP offers no swept pathway analysis at any point, not even the most critical junctions or 90 degree bends such as in Manuden outside the Yew Tree Pub. HGVs turning onto oncoming traffic and possibly mounting pavements is a unacceptable danger.

I would also like to reiterate that the applicant put this third revision plan in after comments were closed and no proper public consultation or opportunity to comment has been sought, nor were we notified. I subscribe to emails from PINS for this application and received email notification for all other supplementary documents,

but not Statera's 3rd revision CTMP, submitted only 2 days before the Inspector's hearing.

I will be sending a copy of my concerns to Uttlesford Council and to the Planning Inspector who I hope will receive these concerns as fair opportunity to respond to Statera's late submission.

Best regards

Sarah Wright

The preferred route to the Pelham Solar construction site is shown in red in Figure 2:

