

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

(Redetermination)

The Planning Inspectorate Hearing
on 26th March 2024

Item 5 of Issues Report :

The Effect of the Proposal on Highway Safety

Sara Yarrow

Introduction

My contribution today is in response to item 5 of the Issues Report, which states : “The impact of the proposal in highway terms appears to depend on the question of whether conditions can be composed that address any potential harm in these terms notably through the Construction Traffic Management Plan (CTMP). “

I believe that no conditions can adequately ameliorate the potential unacceptable harm of this massive industrial development on our fragile road network and on rural communities.

PtP’s Consultant

The developer has prepared a third version of their CTMP which was not made public until the hearing on 9th March 2023. Protect the Pelhams subsequently commissioned Railton TPC Ltd to comment on this document. I submitted this in writing before the deadline on 8th January and would like to remind the Planning Inspector of the principal issues raised.

Statera’s Consultant

It is a concern that the CTMP has not been prepared by a recognised transport or highways specialist, it is not attributed or dated and does not demonstrate proper understanding of conventional approaches to Transport Impact Assessment and Environmental Impact Assessment.

Lack of evidence

Assumptions made by the developer are not supported by evidence, records of highway safety are not assessed and the proposed mitigation measures are not conventionally scrutinised.

Lack of Transport Statement

No Transport Statement has been produced, despite this being an initial requirement. Railton’s review of the Crashmap website 2 reveals twenty personal injury road traffic accidents along the proposed route over the past five years. This information has not been used to inform any part of Statera’s CTMP.

The “Preferred” Route (what does that actually mean?)

The developer proposes directing HGV vehicles to the site from the M11, then along a circular route that will travel through the heart of 7 villages on the way to the site and 4 on the return journey.

The Sensitivity of the Route

The proposed circular one way route may reduce the risk of construction vehicles meeting each other, but that does not remove the risk of these vehicles on road users, including cars, cyclists, pedestrians and equestrians.

Construction vehicles will have to negotiate busy Stansted Mountfitchet, Quendon’s through road and Newport’s highly constrained High Street and Wicken Road junction. In Clavering, it will also pass along the narrow carriageway boarded by narrow footways and the village’s Primary School.

The residents of Berden will be seriously impacted as two way traffic is proposed through the village. The construction route passes the Village Hall which is only accessible by walking along a narrow section of carriageway with no footways or verges, with a blind bend at one end a blind crest at the other. No account is taken of private drives accessing Ginns Road that add to the potential congestion of the route.

Manuden in particular is a highly sensitive village with on street parking, narrow and absent footways. There are Listed buildings of significant historical interest overhanging the carriageway, tight bends with restricted forward visibility and a primary school associated with significant movement of vulnerable highway users during school opening and closing times.

Inaccurate Trip Generation Calculations

There is a lack of transparency on the approach adopted to calculate the trip generation information provided and the accuracy of the numbers therefore needs confirmation.

Cumulative Impact

Including this proposal, there are four major solar developments in the area around Berden, each will generate a worrying number of construction vehicles. The applicant suggests an agreement can be reached to co-ordinate this, but it is not clear how this will be achieved or enforced.

Public Rights of Way

The developer acknowledges that there are two Rights of Way that pass through the site and a further Right of Way that "could" also be impacted by vehicles. This sounds like a significant understatement and has great potential of risk to pedestrians.

Conclusion

I urge you to refuse permission for this development on the grounds that the applicant has not provided sufficient or acceptable information on highway safety for the proposed development and the potential risk to local residents' is therefore significant and unacceptable.