TAKELEY STREET ACTION GROUP (TSAG)
FORMAL PLANNING REPRESENTATION

TRANSPORT & HIGHWAYS OBJECTION

Planning Application: Land North of Taylors Farm

Application Reference: UTT/25/2786/OP

Local Planning Authority: Uttlesford District Council

Submitted by:
Takeley Street Action Group (TSAG)
A local residents' action group representing +600 residents of Takeley and neighbouring towns and villages.

This document forms part of a coordinated set of technical objections submitted by TSAG in response to the above planning application.

Document Status:
Formal Written Objection

Version:
07/12/2025

Date:
15/12/2025

Contact:
Takeley Street Action Group (TSAG)
Email: takeleystreet@gmail.com
Website: www.savetakeleystreet.com

This representation is made in the public interest and is intended to assist the Local Planning Authority, statutory consultees and members of the Planning Committee in reaching a lawful, informed and sound planning decision.

1. Executive Summary – Transport & Highways Objection

Key findings:

1. The **Proposed Access is unsafe and incomplete**, with substandard taper length, junctions spaced too closely, no bus tracking, unenforceable turn restrictions, no pedestrian buffer, no right-turn ghost island and, critically, **no Stage 1 Road Safety Audit to prove that any of it is safe.**

2. The Environmental Statement confirms a **Moderate Adverse / Significant road safety impact on the B1256** — triggering NPPF 116 refusal.

3. The Transport Assessment models **only B2 traffic** despite applying for B2/B8 use, **underestimating HGV movements by ~67%** (~+199/day), and only covers 5am – 9pm (16hrs). As no operational hour restriction exists, the realistic worst-case scenario is 24/7 use, meaning night traffic, noise and safety impacts are unassessed.

4. Modelling assumes a **fictional 20% traffic reduction** to make junctions appear acceptable; no evidence it can be achieved.

5. **M11 J8, Priory Wood & Four Ashes junctions are already near or over capacity** in the Base + Committed case.

6. **Required VISSIM modelling was not provided**, meaning strategic junction impact is unknown.

7. The proposed cycle route **fails LTN 1/20 minimum width, continuity & safety standards**, contains a 120m 2.0m pinch-point, crosses 38 driveways and 5 side roads, and terminates abruptly into live traffic. Delivery is not secured by S106/S278, so may be downgraded, delayed or never delivered.

8. Trip distribution uses **airport-biased MSOA data**, inflating bus/rail mode share and suppressing car/HGV reality.

9. No **comprehensive Travel Strategy** exists — only an aspirational Framework Travel Plan, unfunded and non-binding.

10. **Stansted 51mppa was not fully included in cumulative modelling** (only sensitivity-tested), resulting in an under-assessment of traffic impacts contrary to NPPF requirements.

11. Northside application **removes the M11 fourth-lane capacity LNTF modelling relies upon**, invalidating assumptions.

Conclusion:
The transport evidence is incomplete, unrealistic and materially underestimates impact. The applicant's own modelling confirms Significant safety harm, and key mitigation is neither proven nor secured. Under **NPPF Para 116**, the local authority is required to refuse the application on transport grounds.

Table of Contents

Section Number **Page Number**

2. Review of Proposed Access Arrangements

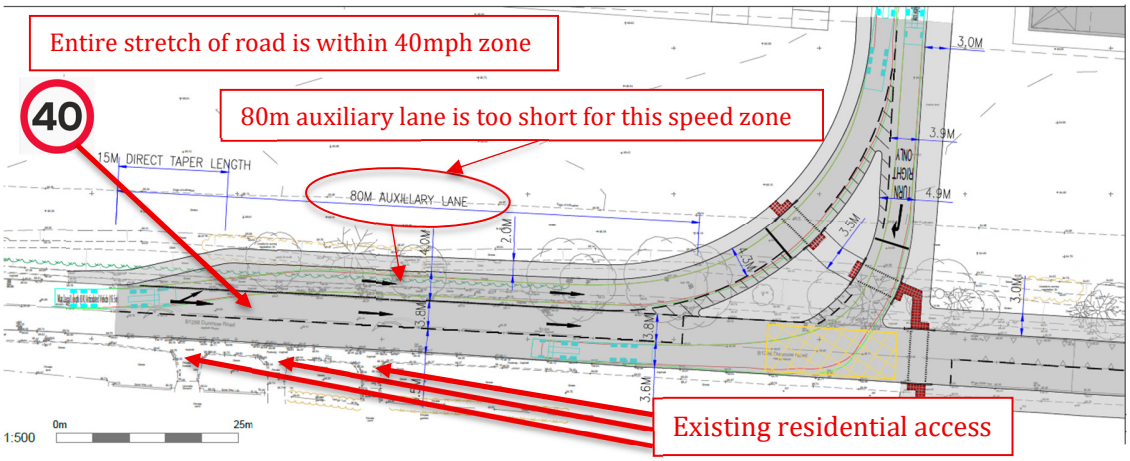
Summary

This section highlights the shortfalls in the design of the Proposed Access Arrangements.

1. Auxiliary Taper Lane too short.

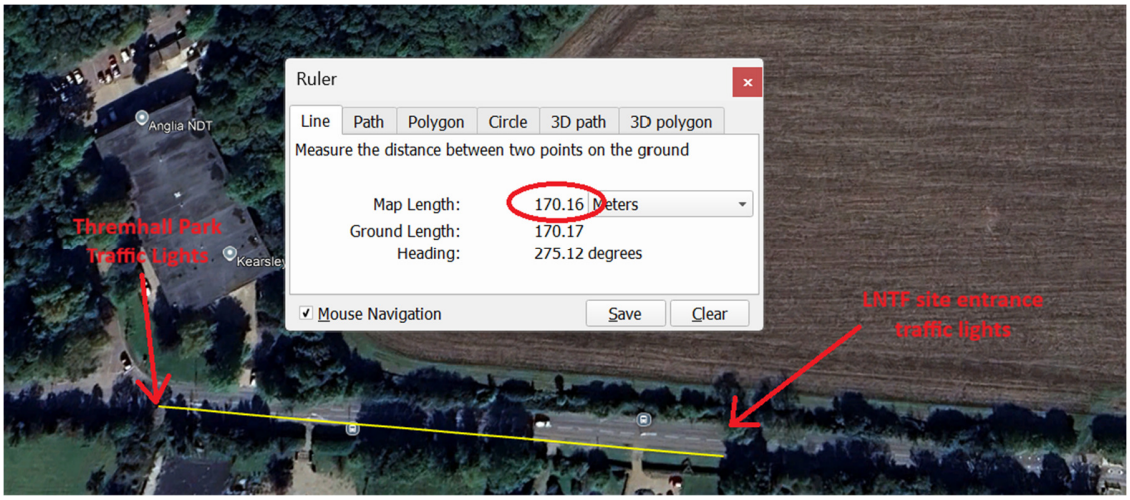
While 80m may meet the CD123 minimum for an auxiliary lane, the applicant has not demonstrated that it provides sufficient reservoir storage for peak left-turn HGV demand under the proposed signal operation. With the proposed number of HGV movements/day, an 80m lane typically stores only ~4–5 HGVs; without junction modelling outputs showing maximum left-turn queues and spillback risk, the adequacy of the 80m length remains unproven.

No Stage 1 Road Safety Audit has been submitted despite access being the only detailed matter for approval, especially to demonstrate that this design is safe for HGV volumes anticipated by a B2/B8 enabled site. Under DMRB GG119 a Stage 1 RSA is required at preliminary design stage before access is granted. Without it, the safety of the junction, visibility splays, HGV movements and collision risk have not been evidenced. Approval of access without an RSA would be premature and potentially unsafe.



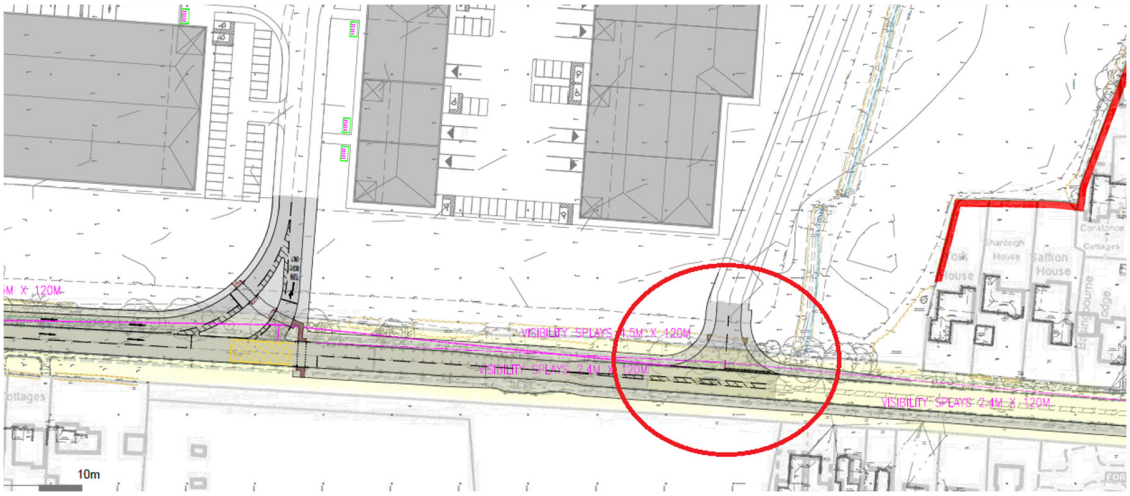
2. Proposed site access traffic signals too close to Thremhall Park traffic signals.

The proposed LNTF site access signals are only 170m from the next signalised junction at Thremhall Park. For a 40mph HGV route this falls below typical design guidance where spacing of 200m+ is generally required to prevent queue overlap, blocking back and conflict between junctions. No VISSIM microsimulation has been provided to demonstrate coordinated operation or confirm that queues will not interact. Without proof that both junctions can operate safely and efficiently together, the access layout cannot be considered safe or compliant with NPPF Para 116.



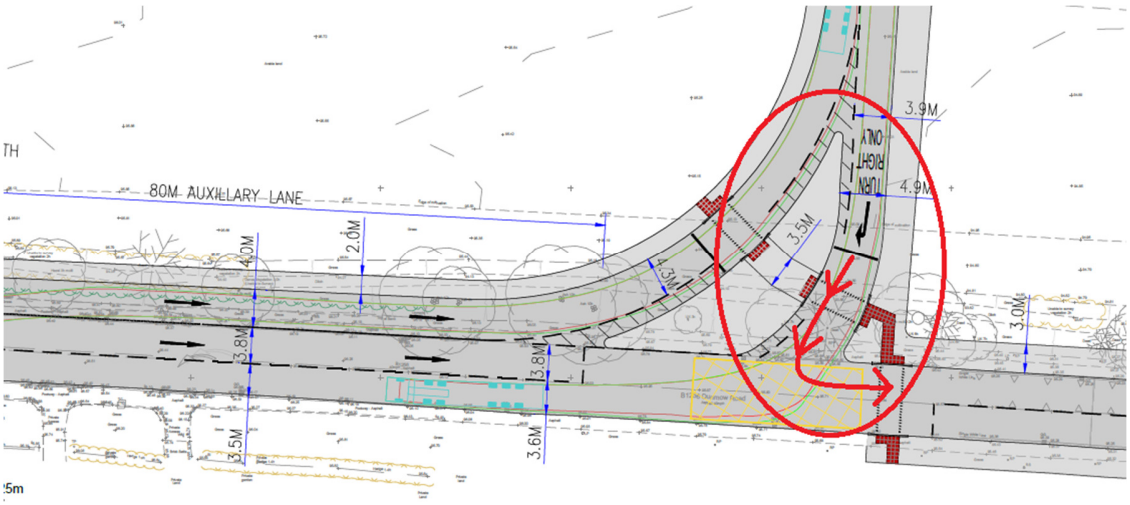
3. Lack of Bus tracking diagram via the Emergency/Secondary access point.

Although the Framework Travel Plan references discussions with bus operators regarding routing through the site, no swept-path analysis or geometric evidence has been provided demonstrating that a full-size bus can enter and exit safely without overrunning the centerline or opposing lane. Without bus tracking diagrams, the deliverability of the claimed internal bus routing and emergency access strategy remains unproven.



4. Non-enforceable right turn only exit

The proposed right-turn only exit is controlled only by signage and road marking, with no physical design preventing left-turn movements. Such non-physical restrictions are not enforceable and are routinely ignored by drivers. The Transport Assessment assumes full compliance with right-turn-only routing, yet the design provides no actual mechanism to ensure this behaviour. In reality a proportion of vehicles — particularly cars, vans and LGV's will turn left, altering distribution flows and invalidating the traffic modelling assumptions.



5. No verge or buffer between road and pavement.

The diagram above provides no verge or buffer between the carriageway and pedestrian route. Best practice typically seeks ~1.5m separation (or robust physical segregation) where HGV movements occur, yet the proposal runs pedestrian/cycle space directly against

the carriageway. This creates a high-risk interface with heavy goods vehicles with no recovery space, contrary to MfS and principles of CD143 safe separation.

Pedestrians walking right beside HGV traffic — no safety buffer provided. School children waiting for buses within 80cm of 44-tonne lorries.

6. No ghost-island right-turn lane is provided for the secondary access.

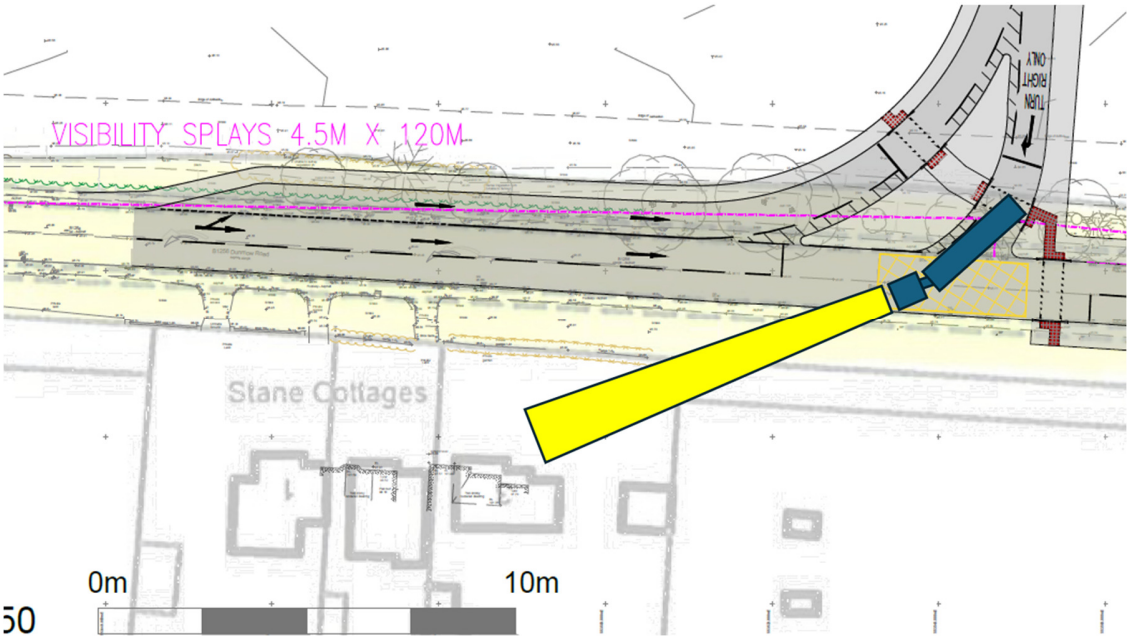
Even if HGVs are excluded, right-turn movements by cars and buses will stop in the running lane, causing queueing and rear-end shunt risk. DMRB turning-lane standards expect a protected right-turn pocket unless turning movements are extremely low and proven. No evidence has been provided to justify omitting a ghost-island or deceleration lane.

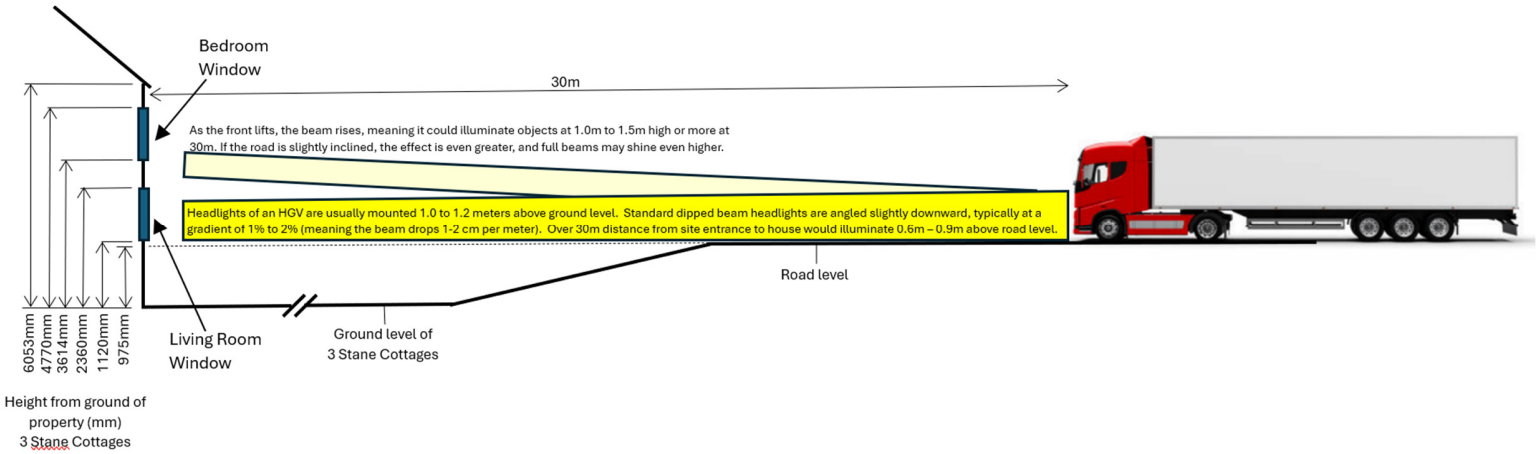
7. Lack of Stage 1 Road Safety Audit

No Stage 1 Road Safety Audit, no NMU audit and no pedestrian desire-line analysis have been provided. These are normally mandatory when access is fixed at outline stage. The safety of pedestrians, cyclists and vulnerable road users has not been demonstrated, contrary to GG119 and LTN 1/20 requirements.

8. Exiting vehicles will shine headlights straight into nearby bedrooms at night.

The proposed right-turn exit will project headlight glare directly into the windows of homes opposite, which sit below highway level, causing night-time disturbance, loss of privacy, sleep disruption and unacceptable amenity impact — contrary to NPPF on safeguarding residential living conditions. If land height of site is raised this could be significantly worse.





Residents of these properties would be exposed to elevated noise levels from queuing traffic, including HGVs decelerating and down-shifting to enter the site and accelerating through the gears when exiting.

Conclusion

The proposed access arrangements have not been demonstrated to be safe, suitable or deliverable for a B2/B8-enabled development of this scale. The design relies on minimum standards and assumed driver compliance rather than evidence, with no modelling or safety analysis to show that the access can safely accommodate the anticipated HGV, bus and general traffic movements.

The adequacy of the 80m auxiliary lane, the close proximity of signalised junctions, the absence of turning protection at the secondary access, and the lack of pedestrian buffers remain unproven. Critically, no Stage 1 Road Safety Audit, NMU audit or pedestrian desire-line assessment has been provided, despite access being fixed at outline stage, contrary to DMRB GG119 and LTN 1/20.

In the absence of robust safety evidence and enforceable design measures, the access proposals fail to meet **NPPF paragraph 116** and cannot be considered acceptable. Approval would therefore be premature without a revised access design supported by appropriate audits and modelling.

3. Significant adverse road safety impact on the B1256

Summary

The Transport & Access Assessment (T&A)—part of the Environmental Statement—identifies a Significant adverse road safety impact on the B1256 during the operational phase of the development. Under National Planning Policy Framework (NPPF) paragraph 116, this impact requires refusal of the planning application.

1. Applicant's Own Evidence Identifies a Significant Road Safety Impact

In the Transport & Access chapter of the Environmental Statement, Section 8.7.16 states:

"The significance of effect during the operational phase of the Proposed Development on road safety is Negligible on all links within the study area, with the exception of the ***B1256 (The Street/Dunmow Road) which has a Moderate Adverse significance of effect, and therefore in EIA terms to be a Significant effect."***

This is the applicant's formal Environmental Impact Assessment conclusion. The B1256 will experience a Moderate Adverse impact, which is defined as Significant in EIA methodology.

2. A Significant Adverse Road Safety Impact = Unacceptable Impact (NPPF 116)

NPPF paragraph 116 states:

Development must be refused if it would result in:

- an unacceptable impact on highway safety, or
- a severe residual cumulative impact on the road network.

A Moderate Adverse (Significant) road safety impact constitutes both an unacceptable impact on highway safety and a severe residual impact in NPPF terms.

3. No Evidence That Mitigation Removes This Significant Impact

The Environmental Statement attempts to suggest mitigation reduces the Significant impact to *"Negligible",* but no collision modelling, no quantified safety analysis, and no before/after risk assessment is included. None of the proposed mitigation is evidenced to eliminate or materially reduce the Significant adverse road safety impact.

4. UDC Cannot Approve This Application Under National Policy

Given that the Environmental Statement confirms a Significant adverse road safety impact, NPPF 116 is directly engaged. A development causing an unacceptable impact on highway safety must be refused. Any approval would be contrary to national policy, unsound, and at risk of **legal challenge.**

Conclusion

The Transport & Access Assessment identifies a *"Moderate Adverse / Significant"* road safety impact on the B1256. As the applicant has provided no technical evidence that mitigation removes this impact, the significant effect stands. The proposal fails NPPF paragraph 116 and must be refused.

4. Underestimation of HGV/LGV Traffic Due to Use of B2 Industrial Trip Rates

Summary

Trip rates were modelled using predominantly B2 industrial data, with 70% of floorspace assumed as B2 and 30% as office. No B8 warehouse/distribution scenario was modelled despite the application allowing B8 use, meaning HGV movements are likely significantly underestimated.

The Transport Assessment Section 7 (page 31) states:

*"Whilst the application includes for mixed employment uses an indicative unit mix of 70% industrial estate/ storage **and distribution** and 30% office/business use is assessed for the purposes of this TA. This unit mix has been agreed through consultation with National Highways and Essex County Council".*

However, in Section 9 Trip Generation, all traffic forecasts are derived from TRICS B2 industrial datasets only, despite the application seeking B2/B8 flexible employment space including warehousing. This is a critical distinction because B8 generates substantially more HGV/LGV activity than B2, particularly where last-mile delivery, freight logistics and 24-hour operation are expected.

- **B2 (General Industrial)** → mainly staff car trips, minimal HGV
- **B8 (Warehouse/Distribution)** → **HGV & van intensive**, shift-pattern, freight-driven

Using B2 rates **suppresses predicted heavy vehicle flows by ~67%**, materially understating impacts on **traffic capacity, safety, noise, vibration and air quality**.

Industry evidence and TRICS norms confirm B8 sites generate multiples more HGV/LGV trips per m^2 than B2 — especially in locations adjacent to strategic freight infrastructure such as M11, A120 and Stansted Airport. The TA has therefore modelled the least impactful scenario, rather than the realistic or worst-case outcome required for robust assessment.

Quantified Impact

Source	Trip Rate Applied	Result for 70% of Site (~58,100 sqm)	Outcome
TA Appendix D (p19) – **B2 only**	0.592 HGV/100sqm	~373 HGV/day	Used in modelling
UDC Reg19 Study (p164) – **B8 rate**	0.985 HGV/100sqm	~572 HGV/day	Realistic logistics case

Difference = +199 HGV/day → ~67% higher when modelled as B8.

(Approx extra +6000 HGV's per month).

In plain terms: *Two-thirds of the HGVs have been designed out of the modelling.*

The TA relies on B2-only TRICS trip rates despite a B8-enabled development, resulting in a material understatement of HGV/LGV movements. The realistic B8 case increases HGV volume by ~67%, meaning all downstream junction modelling runs artificially low.

Additionally, TRICS modelling reflects only weekday daytime peaks and daily totals from 5am – 9pm (16hrs total) and does not assess 24/7 operation, night-time HGV movements or shift change peaks typical of B8 logistics sites. As no operational hour restriction exists, the realistic worst-case scenario is 24/7 use, meaning night traffic, noise and safety impacts are unassessed.

The Transport Assessment therefore cannot be considered robust. The assessment is not precautionary, does not reflect operational reality, and therefore does not meet NPPF 111–116 requirements for safe, cumulative transport evaluation.

A revised Transport Assessment is required using:

1. Full B8 or blended B2/B8 TRICS rates,
2. HGV sensitivity testing, and
3. Re-modelling of all junctions including B1256, Four Ashes, Priory Wood & M11 J8.

Conclusion

The Transport Assessment is fundamentally flawed by its reliance on B2-only TRICS trip rates for a development that explicitly permits B8 warehouse and distribution use. By modelling the least HGV-intensive scenario rather than a realistic or worst-case operational outcome, the assessment materially understates HGV and LGV movements by approximately 67%, equating to around 200 additional HGVs per day that have not been tested within the network.

5. Conflict Between Northside S106 Variation and LNTF TA Modelling (removal of the M11 J8 fourth lane)

Summary

This section sets out the conflict created by application UTT/25/2814/DOV, where the Northside developer seeks removal of the M11 J8 fourth lane widening previously secured under S106, and which the developer for LNTF relies upon.

Sources:

- UTT/25/2814/DOV – Northside S106 Variation (Appendix A – Annex A-F)
- LNTF Transport Assessment (TA) – Appendix 8.1 (2025)

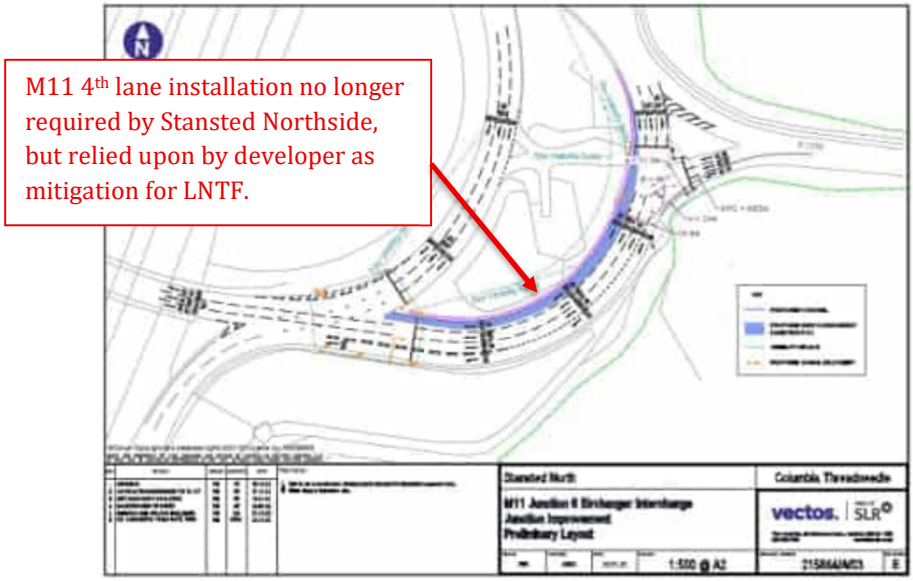
Key Facts:

1. Northside's submitted S106 variation (UTT/25/2814/DOV) confirms they will not deliver the fourth lane at M11 J8.

Page 64 of the new Stansted Northside Transport Assessment (below) found within UTT/25/2814/DOV specifies the TA seeks to demonstrate that the full scheme is no longer needed.

5.2 The consented scheme for M11 Junction 8 shown below is not considered in this report. The TA seeks to demonstrate that the full scheme is no longer needed.

Figure 4 – Consented M11 Junction 8 Improvement



2. Their justification relies on modelling including only:

- Northside site traffic
- TEMPro background traffic growth
- ECC's prior J8 works
- Opening of M11 J7A

Importantly, it explicitly excludes LNTF flows.

3. This application is expected for determination in December 2025.

4. The Taylor's Farm (LNTF) Transport Assessment still relies on the additional capacity from the fourth lane as shown in Appendix J of their TA, that is now subject to a separate application seeking its removal.

Conclusion:

This contradiction fatally undermines the LNTF modelling. The assessment depends on mitigation that is no longer secured or deliverable, resulting in a fundamentally flawed and non-cumulative Transport Assessment that fails to meet the requirements of the NPPF and DfT Circular 02/2022.

6. LTN 1/20 Compliance Review – B1256 Proposed Cycle Route

Summary

The applicant's claim that the proposed two-way cycle route complies with LTN 1/20 is not supported by design. The scheme fails to meet national minimum design standards for width, continuity, safety, separation from traffic, suitability adjacent to a busy distributor road, and integration with wider pedestrian/cycle networks. As designed, it would expose cyclists to high-risk conflict conditions and cannot reasonably be described as LTN 1/20-compliant.

1. Minimum Width Requirements

- LTN 1/20 requires a minimum 3.0m width for a two-way cycle track.
- Width reductions below 3.0m are only permitted for extremely short, unavoidable constraints. The proposal reduces within to 2.0m over 120 meters, which is extended not short-duration.
- A width of 2.0m is only permissible for a one-way cycle track – not two-way.
- The proposed 2.0m pinch point is therefore non-compliant.

2. Nature of the 'Constraint'

- LTN 1/20 tolerances apply only for fixed physical constraints (e.g., bridge abutments, listed walls).
- The constraint here is a narrow verge and boundary line – not an immovable obstacle.
- Lack of land control is not a valid justification for substandard design under LTN 1/20.

3. Carriageway Narrowing

- The proposal reduces part of the B1256 from 7.3m to 6.75m adjacent to cycle lane.
- The B1256 carries 9,000–12,000 vehicles/day, including HGVs and buses.
- 6.75m is insufficient for safe opposing HGV movements without close-pass risk.
- LTN 1/20 states that higher-risk environments require greater buffer and width, not less.
- Reliance on a future / uncommitted 30mph reduction is not a safety guarantee. The narrowing creates and increased collision risk.

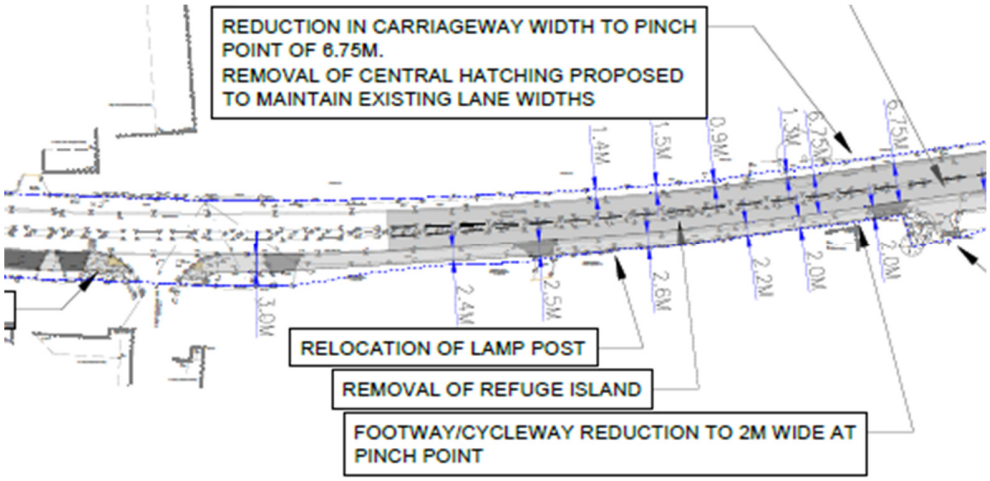
4. Non-Isolated Pinch Point

• The proposed narrowing extends for around 120 metres — far beyond what could be considered a brief or "extremely short" constraint. LTN 1/20 only permits sub-standard widths in very short, unavoidable pinch points, not sustained lengths running adjacent to a heavily trafficked and hazardous road (B1256)

• LTN 1/20 requires pinch points to be minimal in length and only at unavoidable features.

• This design creates extended substandard width, rendering the route non-compliant.

The diagram below shows the proposed narrowing to 6.75m for the carriageway with a 2.0m cycle lane (total width 8.75m) forcing HGVs, buses and cyclists into close proximity. **<u>This design is unsafe and risks becoming a collision hotspot.</u>**



5. Safety Concerns Adjacent to Traffic

• LTN 1/20 warns strongly against two-way cycle tracks immediately next to a carriageway without adequate width and buffering.

• This arrangement increases the risk of head-on cycle conflict and cycle–vehicle interaction.

Picture showing proposed cycle way proximity to road.

6. Forced Merge into Traffic Near Four Ashes Junction

- The route ends by forcing cyclists back into the B1256 near a known congestion hotspot.
- Junction modelling predicts delays and queues — a high-risk re-entry point.
- LTN 1/20 requires coherent, continuous routes without abrupt termination.

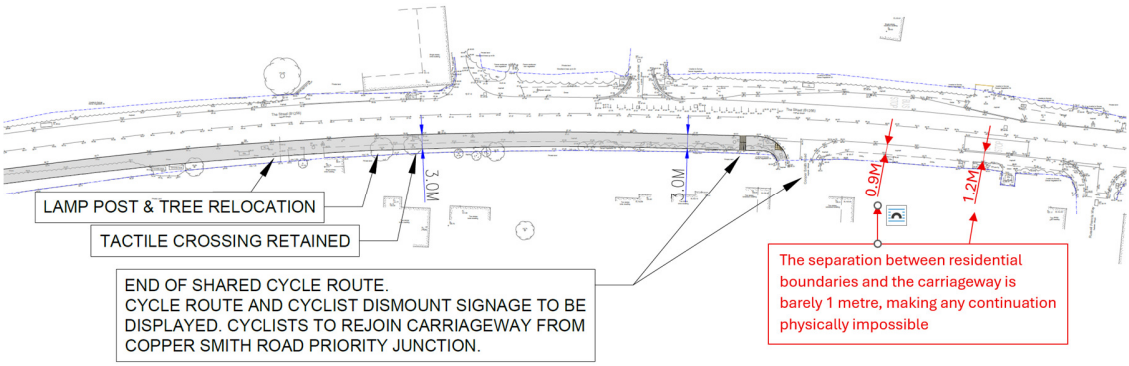


Diagram proving end of cycle way is purely due to constraints of highway (houses within 1m of roadside).

7. Repeated collision interfaces

The proposed 2.2 km cycle way consists of:

- 38 driveway crossings + 5 side roads over 2.2km ≈ a conflict every ~51m.
- Each crossing point represents a potential vehicle-cycle conflict.
- LTN 1/20 expects low-conflict design, not continuous interaction points.
- High collision exposure.

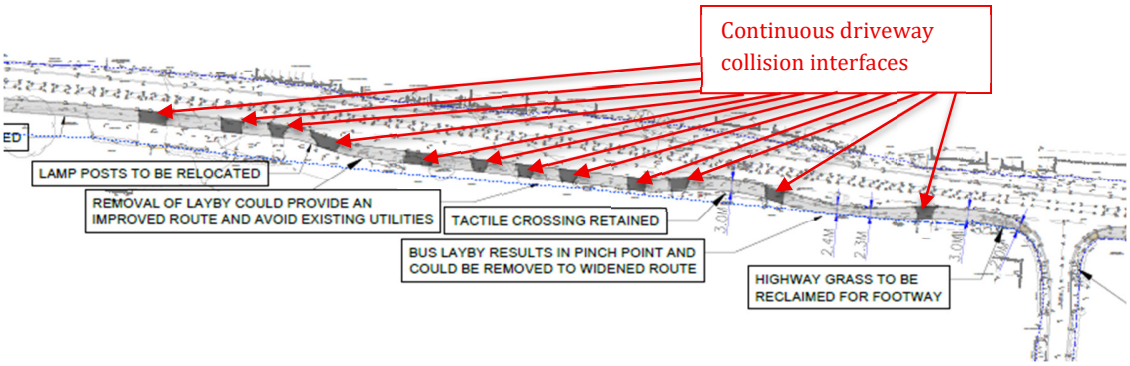


Diagram showing small stretch of proposed cycle lane with continuous driveway collision interfaces.

8. The Route is Entirely Constrained by Available Land

• Cycleway alignment exists only where verge width happens to permit it.

• Westbound continuation is physically impossible due to private boundaries, hedges, trees, and no pavement on B1256 south side.

• Northern pavement on B1256 reduces to ~30cm, far below usable infrastructure width.

• Route dependent on geometry, not strategy.

9. No Connection to Takeley Village

The route stops approximately 2.2 km east of the site because the verge narrows to around 1 metre between the road and residential boundaries, making continuation physically impossible. As a result, the route fails to connect to Takeley's homes, schools, shops or transport nodes.

10. No Strategic or Functional Benefit

The route does not link to the M11, Bishop's Stortford or Stansted Airport. The scheme is fragmented, constrained and incapable of delivering the modal shift claimed in the Transport Assessment

11. A Widened Footpath, Not a Cycle Lane

Although labelled as cycle infrastructure, the proposal is simply a widened shared-use footway with no segregation, no consistency and no safe continuity. It fails to meet LTN 1/20 standards and does not constitute a functional cycling corridor. LTN 1/20 requires a minimum of 3.0m for shared-use paths and 2.0m for one-way cycle tracks, with wider provision expected on high speed or high traffic roads. The proposed route appears to narrow significantly at several points and sits immediately adjacent to the live carriageway without adequate physical separation or buffering.

12. No assurance of construction

The 2.2km cycleway is requested to be secured solely by planning condition with no S106 or S278 obligation and no delivery trigger defined, there is no assurance that it will be constructed prior to occupation**. The LPA should insist upon a condition confirming the cycle lane must be delivered prior to occupation of any part of the development .**

Table 8.16: Proposed Mitigation

Ref	Measure to avoid, reduce or manage any adverse effects and/or to deliver beneficial effects	How measure would be secured				
		By Design	By S.106	By S.278	By Condition	By Contribution
1	Creation of a new footway/cycleway along the B1256 (The Street/Dunmow Road) towards Takeley				X	

Evidence of cycleway to be secured solely by planning condition, with no S.106 or S.278 obligation.

13. Lack of Westward Connectivity – Non-Compliance with LTN 1/20

Appendix D's cycle infrastructure drawings truncate the western boundary of the site, omitting the fact that no cycle route is currently achievable towards the M11/Bishop's Stortford due to the applicant not owning or controlling the necessary land. The plans also fail to acknowledge that no pavement exists along the southern boundary to the west of the site, and that the northern pavement on B1256 reduces to approximately 30cm in width in places — far below the minimum standards for pedestrian or cycle provision.

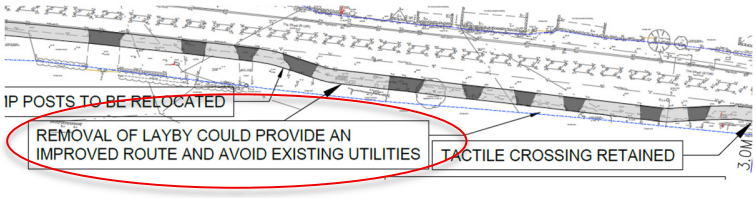
Under LTN 1/20, Section 1.6.1, cycle infrastructure must provide *"coherent, continuous routes with safe access to key destinations"*. A route that terminates abruptly at the site boundary, without any deliverable connection to the wider network, cannot meet the continuity requirement. As presented, the submitted drawings create a misleading impression of realistic network connectivity and deliverability, and the westward link cannot be assumed feasible, safe, or policy compliant.

Picture showing road West of LNTF.

Picture showing pavement West of LNTF (B1256 northern pavement / verge) .
Pedestrian forced out on to road. Pavement in this location measures 50cm and is entirely overgrown.

14. Cycle Lane Requires Removal of Resident Parking Bays — No Impact Assessment Provided

The TA discussed the removal of the B1256 layby to deliver a shared-use cycleway. However, this layby has recently been converted into Resident Permit Parking and forms an active part of local parking provision. The TA does not assess loss of resident bays, parking stress impact, displacement onto side roads, or alternative provision.



Conclusion

The proposed B1256 cycle route does not meet LTN 1/20 standards. It delivers extended sub-standard width (2.0m over approx. 120m), insufficient separation from heavy traffic flows, frequent conflict points with private driveways and side roads, and an unsafe termination that forces cyclists into live traffic near a congested junction. These issues represent failures of core LTN 1/20 design principles – safety, directness, coherence, comfort and attractiveness.

In its present form, it represents a "footway widening exercise to nowhere". The route cannot reasonably be considered compliant or safe. It should not be relied upon as mitigation for transport impacts and must be significantly redesigned – and legally secured via S106/S278 with pre-occupation triggers – if it is to provide a policy-compliant cycling facility.

7. No Comprehensive Travel Strategy Submitted

Summary

This section addresses the applicant's claim that *"a comprehensive travel strategy has been submitted as part of this application."*

Having reviewed all transport-related documents in detail — including:

• EIA Vol 2 Appendix 8.1 – Transport Assessment
• EIA Vol 2 Appendix 8.2 – Framework Travel Plan
• All supplementary appendices and diagrams

—it is clear that **no such document exists**.

There is **no standalone Travel Strategy**, no master plan for sustainable transport, and no transport strategy that meets the definition required under the NPPF, LTN 1/20, or Essex County Council's Local Transport Plan.

The FTP is explicitly a **framework**, non-binding, without funding commitments, delivery programme, or enforceable modal shift measures.

A 2.2km cycle link is illustrated, but this is **just a single corridor**, not a cycling network plan. It includes no specification, phasing, safety treatment, or integration strategy with the wider LCWIP network.

The applicant also states that discussions have taken place with Arriva regarding routing buses via the proposed Mobility Hub. However, the referenced services operate only every ~30 minutes between 7am – 7pm and are not 24/7, meaning they do not provide a viable mode for shift patterns, freight-based employment, or regional commuting. No guaranteed service uplift, subsidy agreement, frequency improvements or long-term bus funding mechanism has been provided.

Conclusion

The submission contains a TA and a high-level Framework Travel Plan only. There is no comprehensive travel strategy, and suggestions of future bus/cycle provision are indicative rather than committed, funded or secured. The application therefore lacks a credible transport strategy capable of achieving the claimed mode shift.

8. Traffic & Highways (Vision Led Approach Claim to reduce traffic levels by 20%.)

Summary

The section confirms that the developer's traffic assessment is fundamentally flawed and does not meet the requirements of the National Planning Policy Framework (NPPF 2024).

The developer claims they have used a "vision-led" approach to reduce traffic levels by 20%. This is misleading and does not align with the actual meaning of "vision-led" in national policy.

1. This is not a true "vision-led" approach

A proper vision-led approach means that the design of the development must be based on reducing traffic from the very start. Instead, the developer has taken the normal traffic modelling results (which showed the roads failing) and then manually reduced the traffic by 20% to make the numbers look better. This is not an acceptable way to assess real impacts.

2. A 20% traffic reduction is completely unrealistic

The proposal is a large logistics and warehouse development, which produces constant HGV movements, courier vans, shift workers travelling at times when buses don't run, and 24/7 operations. These types of trips cannot be reduced by cycle parking, a "mobility hub", a bus loop, walking routes, or a Travel Plan. Mode shift of this scale is simply not realistic for this type of development.

3. The developer's own TRICS data does not support this reduction

Only 1 out of the 7 comparison sites had a Travel Plan. This means the trip data is not representative and may already underestimate traffic. It does not justify removing 20% of the trips.

4. Their modelling already showed severe congestion before the reduction

Without the 20% reduction, the modelling showed massive queues, severe delays, and junction failures on the A120 and local roads. Instead of addressing this, the developer simply deleted 20% of the traffic and called it "vision-led".

5. The community deserves a truthful assessment

Artificially lowering traffic numbers hides the true impact and prevents proper planning for safety, congestion, pollution, village access, emergency vehicles, and school routes.

6. What must happen instead

The council must require:

• A proper, evidence-based traffic model with real HGV behaviour.

• A full assessment without arbitrary reductions.

• A transparent methodology that meets national standards.

• A realistic understanding of freight, shift work, and 24/7 deliveries.

Conclusion

The so-called “vision-led” scenario is not supported by evidence and does not meet the requirements of the NPPF. The 20% reduction is artificially applied to make the results appear acceptable. Until a compliant and honest traffic assessment is submitted, the application should be refused.

9. Access Arrangements. Left turn in, right turn out. Modelling Must Reflect Real World Behaviour

Summary

The modelling assumes all vehicles will comply with the left-in / right-out access arrangement. In reality, there are two turning points within 750m of the site where drivers could easily U-turn rather than follow the full diversion route, meaning actual routing behaviour is likely to differ significantly from that assumed in the TA.

1. Modelling protocol and NPPF require transport assessments to model real behaviour.

DfT TAG, National Highways Modelling Protocol and NPPF para. 32 all require transport assessments to model real behaviour, not idealised behaviour. Even where highway design discourages certain movements, drivers frequently:

- ignore turn bans
- override physical discouragement measures
- follow satnav routes
- choose shorter or faster routes
- enter and exit in both directions due to human error or convenience

This applies especially to HGV drivers, who routinely violate turn restrictions and mount kerbs where required. Modelling must therefore include leakage, noncompliance and desire-line testing. The TA does none of this.

2. West Only Modelling Suppresses Realistic Impacts

By deleting all eastbound movements, the TA avoids showing impacts on:

- Dunmow and the B1256 East corridor
- Residential areas east of the site
- Takeley Village
- Jacks Lane, Molehill Green, and ratrunning routes
- access to workforce catchments in Dunmow, Braintree, Chelmsford and A120 East

This is not a neutral or evidence led modelling choice; it is a structural suppression of real impacts.

3. Physical Access Design Does Not Justify Deleting Movements

Although the applicant proposes a layout intended to discourage eastbound movements, highway design cannot eliminate:

• wrong-way entries

• prohibited turns

• HGV encroachment

• satnav routing through restricted turns

• local eastbound workforce trips

• delivery vehicles travelling in both directions

Furthermore, even if the access layout attempts to discourage eastbound movements, drivers can easily circumvent this within seconds. A U-turn can be performed at the Thremhall Park entrance only 80 metres west of the site access, and HGVs can execute a compliant turning manoeuvre at the Stansted Distribution Centre 750 metres away, which provides a 30-metre-radius dedicated turning circle. These real-world opportunities make it impossible to restrict eastbound routing in practice, demonstrating that the TA's 'west-only' assumption is unrealistic and non-compliant with TAG and National Highways behavioural modelling requirements.

Modelling must therefore include leakage scenarios (typically 5%, 10%, 20%) and sensitivity tests. None are provided. As a result, the modelling does not comply with TAG M3.1, National Highways protocols, or standard industry practice.

4. Impact on Cumulative and Safety Assessment

Because the TA artificially restricts all movements to the west, the applicant fails to assess:

• realistic eastbound traffic impact

• cumulative impact with Stansted Airport's 51mppa expansion not fully modelled

• impacts on sensitive PRoW and Flitch Way crossings

• eastbound queueing and conflict risks

The Environmental Statement already admits a "Moderate Adverse – Significant" road safety impact on the B1256. Removing eastbound flows prevents a lawful assessment of full network safety impacts under NPPF para. 116.

5. NonCompliance with National Planning Policy

Under NPPF para. 32, evidence must be robust, proportionate and based on realistic assumptions. Under NPPF para. 116, development must be refused where:

• it causes an unacceptable impact on highway safety, or

• residual cumulative impacts are severe.

A TA that deletes real movements cannot satisfy either test.

6. Recent evidence of HGV's performing dangerous U turns on B1256 and overtaking at the pinch points.

<u>Conclusion</u>

The west only access modelling is technically invalid, suppresses real demand, and fails to reflect actual driver behaviour. It materially understates operational and safety impacts on the B1256 and the wider network. As such, the Transport Assessment cannot lawfully be relied upon, and the planning authority must defer or refuse the application pending a full, realistic, and compliant reassessment.

10. Technical Objection: Failure to Provide Required VISSIM Modelling

Summary

This section details the failure of the developer to provide the VISSIM modelling required by both Essex County Council (ECC) Highways and National Highways (NH). This omission renders the assessment of strategic junction impacts incomplete, unreliable, and noncompliant with national policy and EIA Regulations.

1. Requirement for VISSIM Modelling

The TA (Section 10.11) confirms that both ECC and NH required M11 Junction 8 and Priory Wood Roundabout to be modelled using VISSIM due to the strategic nature and complexity of these junctions. VISSIM is the only appropriate tool for multilane, high volume, signal controlled networks where weaving, blocking, airport flows, and HGV interactions govern performance.

2. Applicant's Failure to Provide Required Modelling

The TA admits that VISSIM was not provided because "access to this strategic model has not yet been granted by ECC". This does not discharge the applicant's obligation. If access was denied, the applicant should have:

• delayed submission, or

• commissioned a bespoke VISSIM model.

Instead, the TA substitutes LinSig, which is not capable of modelling:

• weaving or merge conflicts

• lane blockage

• queue propagation or spillback

• HGV platooning

• multiarm signalised roundabout behaviour

• airport surge traffic

As a result, the modelling of the most critical junctions is technically invalid.

3. NonCompliance with National Policy

NPPF para. 32 requires decisions be based on robust and proportionate evidence. NPPF para. 116 requires refusal where:

• highway safety impacts are unacceptable, or

• residual cumulative impacts are severe.

Without VISSIM, no lawful judgement can be made on either test.

4. EIA Regulations NonCompliance

Under the EIA Regulations, Environmental Information must be:

• complete

• reliable

• based on appropriate technical methodologies

A strategic junction modelled with the wrong tool is noncompliant. The ES is therefore technically deficient.

5. Consequences for Decision-Making

Because the required strategic modelling was not provided:

• the impacts on M11 J8 and Priory Wood are unknown

• any “no severe impact” claim is unsupported

• the TA cannot be relied upon

• the ES must be considered incomplete

Planning permission cannot lawfully be granted on the basis of incomplete or invalid modelling.

Conclusion

The applicant’s failure to produce the required VISSIM model constitutes a fundamental defect in the Transport Assessment and Environmental Statement. Without compliant strategic modelling, the authority cannot conclude that impacts are acceptable or nonsevere under NPPF 116.

Planning permission must therefore be refused, or the application deferred pending submission of a full, compliant VISSIM assessment.

11. Misrepresentation of Four Ashes Signalised Junction Capacity

Summary

The applicant claims the Four Ashes signalised junction would "operate within capacity" in all scenarios. This is **not supported by their own modelling**. Table 15 of the Transport Assessment shows that the junction is already operating at or above capacity in the Base + Committed scenario, even before development traffic is added.

1. The junction is already effectively at capacity before adding the development

The 2025 Base + Committed scenario shows Degree of Saturation (DoS) values of:

• B1256 East: 91.2% (AM)

• Parsonage Road: 89.1% (AM)

• Station Road: 84.5% (AM)

• Multiple delays of 54–75 seconds and queues up to 20 PCU.

Under UK modelling standards:

• DoS above 85% = above design capacity.

• DoS above 90% = over design capacity.

• Delays above 60 seconds = failing operation.

The Four Ashes junction is already operating at or above failure thresholds before adding development traffic.

2. The 2035 Base + Committed scenario produces Degrees of Saturation (DoS) of:

• Parsonage Road – 96.2% / 98.5%

• B1256 East – 96.3%

• Station Road – 95.2% / 97.3%

These values approach 100%, meaning the junction is virtually at its absolute limit. Industry guidance is clear:

• DoS over 90% = unstable flow

• DoS over 95% = practical capacity exceeded

• DoS over 100% = failure

The applicant repeatedly tries to label 95–98.5% saturation as "within operational capacity". It is not. It is on the edge of collapse. This alone contradicts their conclusion.

3. Delays and queues are extreme — and completely ignored

Even before adding the development:

• Queues exceed 112 PCU (Station Road)

• Delays exceed 128 seconds (over 2 minutes)

• Multiple arms show approaching - or actual - gridlock

These are not "within capacity" by any accepted standard.

4. The development scenario is falsely claimed to have "negligible impact"

The applicant attempts to hide the impact by:

• Applying a 20% traffic reduction (which is not evidence-based)

• Showing only the artificially-suppressed scenario, not the true development flows

• Comparing two already-overloaded scenarios and calling the difference "negligible"

This is misleading. When a junction is already at 96–98% saturation, any additional traffic pushes it into failure.

5. The applicant ignores the definition of "severe impact" in the NPPF

NPPF (2024) Para 116 is explicit:

Development should be refused where the residual cumulative impacts on the road network would be severe.

A junction operating at 96–98% saturation, with 100+ vehicle queues, 2+ minute delays, and additional logistics traffic, is the definition of residual cumulative severity.

6. Misleading language and statistical masking

The developer's wording:

"the junction is forecast to operate within operational capacity within all scenarios"

is objectively untrue. They have attempted to disguise actual failure conditions.

<u>Conclusion</u>

The modelling clearly shows that the Four Ashes junction is:

• Already operating at or beyond practical capacity

• Experiencing significant queues and delays

• Extremely sensitive to small increases in traffic

• At risk of failure during peak hours

Conclusion

The claim that the Four Ashes junction is *"within operational capacity"* is factually incorrect. The development will worsen congestion, increase delays, and create unsafe conditions. Under NPPF Para 116, the application should be refused on severe residual cumulative transport impact grounds.

12. Technical Review: M11 Junction 8 – Applicant's Claims vs Actual Modelling Data

Summary

This section provides a clear comparison between the developer's statements about the performance of M11 Junction 8 and the actual modelling results contained within the submitted file "M11 Improvements Modelling Data.pdf".

1. The developer is using PRC totals to hide severe junction failures

The applicant presents only "PRC Over All Lanes" percentages, claiming the junction operates within capacity. However, the modelling file shows lane-by-lane saturation exceeding 100% in multiple scenarios. Examples include:

• A120 West lanes at 105.3% and 105.7%

• Birchanger Services approach at 101.2%

• Circulator (SW) lanes at 102.7%

• Queues between 130 and 180 PCUs

These are complete failures and contradict the applicant's narrative.

2. Junction 8 is already failing before development traffic is added

In the 2030 Base + Committed scenario:

• Multiple lanes exceed 100% saturation

• Delays exceed 130–180 seconds

• Queues exceed 140 PCUs

A junction already failing cannot absorb additional development traffic.

3. The development worsens congestion significantly

In the "2030 Base + Committed + Proposed Development" PM peak scenario:

• A120 East reaches 102% saturation

• Circulator (SW) reaches 101.8%

• Circulator (NW) reaches 104.2%

• B1256 Dunmow Road reaches 106.2%

• A120 West reaches 100.8%

Queues reach 180 PCUs. These represent a severe impact.

4. Mitigation does not solve the capacity problem

Even in the "mitigation" scenario:

• Multiple arms remain 81–100% saturated

• PM peak failures persist across circulator lanes

• Capacity depends entirely on reducing traffic by an unrealistic 20%

This is not an engineering solution.

5. The applicant omitted the true (non-reduced) development scenario

The public planning statement includes only the "reduced vehicle flow" scenario and omits the full development impact. The modelling file clearly contains the actual, much worse results.

6. Misleading language in the planning statement

The applicant claims:

"the impact of the proposed development is insignificant…"

However, full evidence in the modelling file shows:

• Oversaturated lanes

• Excessive queues

• Severe delays

• Worsening of already failing conditions

Conclusion

The applicant's summary of M11 Junction 8 is contradicted by their own modelling. Lane-by-lane results demonstrate that the junction is already at or beyond capacity, and the proposed development worsens this significantly. The impact is severe under NPPF Paragraph 116, and the application should therefore be refused on highways grounds.

13. Priory Wood Roundabout Modelling

Summary

Having reviewed the traffic modelling for the Priory Wood Roundabout ("Priory Wood Modelling Data", TRL Junctions 9, generated 13/08/2025), it is clear that the modelling is not technically robust, not compliant with national modelling standards, and not representative of the traffic associated with a large-scale B8 warehousing/logistics development.

1. The modelling contains fundamental technical errors which render the outputs unreliable. These include:

- Zero circulating flows coded for all arms (model error)

- Unrealistic geometry inputs

- Incorrect traffic profiles (commuter-based, not HGV-based)

- Unrepresentative HGV percentages

- Use of an inappropriate modelling tool for strategic network assessment

- Catastrophic PM peak failures (RFC > 1.5, delays > 9 minutes, queues > 182 PCU)

On this basis, the modelling cannot be relied upon for decision-making, and the application must be reassessed with correct, DMRB-compliant transport modelling.

2. Fundamental Modelling Errors

2.1 ARCADY error: "Large Roundabout Circulating Flow is zero for one or more arms"

This warning appears in every scenario within the modelling report, including base year, future year, committed development, and proposed development scenarios.

This is a critical modelling failure. A functioning roundabout cannot have zero circulating flow. This means the model is not calculating interactions between the arms correctly, resulting in inaccurate capacity results.

This error alone is sufficient to invalidate the model.

Arcady is a poor modelling tool for large roundabouts especially very busy roundabouts. In general, when RFC values go above 0.9 the reliability of the forecasts start to reduce and with values over 1.0, it is pretty much just a random number generator. Put simply the computer programme is being asked to calculate queues and delays in a scenario which is outside of the parameters expected by the programme.

3. Unrealistic and inconsistent roundabout geometry inputs

The modeller has used input geometry that is internally inconsistent, not representative of the real Priory Wood roundabout, and incorrectly specifying inscribed circle diameters (ICDs). These inconsistencies suggest template geometry or incorrectly scaled data.

An invalid base model cannot generate valid future-year results.

4. Inappropriate Traffic Profile for B8 Warehousing

4.1 Commuter peak modelling used instead of freight peaks

The model assesses 08:00–09:30 ("AM peak") and 17:00–18:30 ("PM peak"). These are commuter peaks, not freight peaks. Logistics developments require modelling of HGV inbound/outbound peaks, 24-hour activity, and weekend operations. None of these have been included.

4.2 HGV percentages unrealistically low

The model uses HGV percentages between 2–6%, whereas logistics sites typically operate at 20–30% HGV composition. This significantly understates the impact of the development.

Conclusion

The modelling is not correct and not appropriate for the size or type of development. The errors and omissions render the assessment unreliable, and the application must be reconsidered using fully compliant modelling tools and correct input data.

14. Appendix G – Technical Review of Trip Distribution Methodology (Updated with MSOA/Airport Data)

Summary

This analysis expands the review of Appendix G of the Transport Assessment (TA) for Land North of Taylor's Farm. It incorporates new evidence confirming that MSOA Uttlesford 006 includes part of Stansted Airport and explains why use of this dataset is unsuitable for modelling a logistics-based employment site.

1. Summary of Method in Appendix G

Appendix G derives trip distribution and mode share from 2011 Census Travel-to-Work data for MSOA Uttlesford 006, combined with routing assumptions requiring all traffic and HGV movements to route west toward M11 J8.

Because MSOA 006 includes airport workforce catchment, the resulting modal split is not representative of logistics employment, materially affecting distribution and mode assumptions.

2. Evidence Directly From the Applicant

The Transport Assessment states:

"Table 2 shows that the majority of people travelling for work in Uttlesford 006 travel by car or van (80%). … A higher proportion of people are shown to travel by public transport as MSOA Uttlesford 006… also contains the extent of Stansted Airport."

This confirms:

- MSOA includes Stansted Airport
- Modal share is airport-inflated, not logistics-typical
- Public transport share is artificially elevated
- Data is functionally unsuitable for warehouse workforce modelling

3. Geographically Correct — Functionally Incorrect

Although geographically accurate, MSOA 006 is not appropriate for logistics modelling due to:

- Non-typical modal behaviour from airport staff
- Shuttle and aviation-sector transport not available here
- Airport shifts differ from warehouse employment patterns
- Logistics workers draw from wider car-dependent catchments

Using this dataset distorts mode share downward for car trips and produces optimistic sustainable travel projections.

4. Technical Flaws in Trip Distribution

A. Airport-biased MSOA input → distorted mode share
B. Forced west-only routing → assumes 100% compliance
C. Suppression of eastbound flows → underestimates impact on A120 East, Four Ashes Junction, Dunmow
D. Distribution tables contain internal inconsistencies
E. No HGV/freight origin modelling or TAG sensitivity testing

This approach conflicts with:

• NPPF (Para 111–116) – robust evidence and realistic impact testing
• DfT Circular 01/2022 – auditable, realistic modelling
• TAG Unit M4 – sensitivity testing of alternative scenarios

5. Road Safety Implications

The Environmental Statement itself admits:

"The impact on road safety on the B1256 is Moderate Adverse and therefore Significant." (ES 8.7.16)

With suppressed trip distribution and no cumulative airport uplift applied, real-world impact is likely worse.

Under NPPF Para 116, planning must be refused where:

• residual cumulative impacts are severe, or
• there is unacceptable impact on highway safety

The TA triggers both tests.

<u>Conclusion</u>

MSOA-based modelling is geographically correct but functionally inappropriate. Airport-influenced modal share, west-only routing assumptions, and lack of cumulative airport modelling make the TA not reliable for decision-making.

A new assessment is required using logistics-appropriate workforce datasets, freight distribution modelling, and true full cumulative testing including Stansted 51mppa.

15. Technical Critique of the Transport Assessment – Airport-Influenced Data, Cumulative Impact Failure and Modelling Errors

Summary

This section expands and formalises the technical critique of the Transport Assessment (TA) for Land North of Taylor's Farm. It identifies two critical methodological failures:

• Use of Stansted Airport-distorted MSOA census data to model logistics employment travel patterns
• Failure to carry out a true fully cumulative impact assessment incorporating the Stansted Airport 51mppa expansion (UTT/25/1542/FUL)

Both issues materially undermine the validity of conclusions on trip generation, routing, mode share and highway impact — placing the TA in conflict with NPPF (2023/24) transport requirements and NPPF para. 116 on severe residual impact.

1. Misuse of Airport-Influenced MSOA Data

The TA repeatedly relies on 2011 Census travel-to-work data for MSOA Uttlesford 006. The developer acknowledges:

"A higher proportion of people are shown to travel by public transport as MSOA Uttlesford 006… contains Stansted Airport."

This is a critical flaw.

Airport zones demonstrate non-representative modal characteristics:

• heavy reliance on bus/coach/rail
• employer shuttle availability
• aviation shift-based operations
• wide geographic labour catchments
• modal splits not comparable to B8/logistics

Applying this MSOA data to a logistics park artificially inflates sustainable mode share and suppresses car/HGV assumptions. The modelling becomes internally inconsistent — combining airport-based census behaviour with logistics TRICS rates and policy-led routing.

No alternative MSOA comparison, sensitivity testing, or freight-sector dataset is presented.

This approach conflicts with:

• NPPF requirement for "robust and up-to-date evidence"
• DfT Circular 01/2022 – realistic and auditable modelling
• TAG Unit M4 – sensitivity testing and transparency

Trip distribution and modal split outcomes are therefore not reliable.

2. Airport Expansion – Cumulative Impact Not Modelled Properly

The TA states:

"The 51mppa expansion was assessed as a standalone sensitivity test at M11 J8 and Priory Wood Roundabout."

This confirms:

A) The development and airport uplift were not modelled together
B) The test was restricted to two junctions only
C) No cumulative scenario is presented for the B1256, Four Ashes, Takeley Street, Dunmow Road or local village network

Under EIA and NPPF para. 116, cumulative modelling must:

- combine committed developments, not test them in isolation
- assess realistic future network stress conditions
- demonstrate residual impact post-mitigation

The Stansted 51mppa expansion is already approved, so it counts as committed development. The TA does not properly model this cumulatively, meaning future highways impacts are likely understated.

Given the existing evidence of network stress, this is a material deficiency.

3. Highway Safety Consequences

When combined with:

- suppressed car/HGV mode share
- unrealistic routing compliance
- absence of airport cumulative traffic
- airport-skewed mode data
- lack of sensitivity testing

…the result directly affects road safety evaluation.

Notably, the applicant's ES already states:

"The impact on road safety on the B1256 is Moderate Adverse and therefore Significant."

If road safety is already Significant before airport uplift is included, then cumulative outcomes are likely to be Severe under NPPF para. 116.

Conclusion

The TA:

- uses census data that is not representative of logistics employment
- omits fully cumulative interaction with the 51mppa airport expansion
- suppresses realistic traffic and modal outcomes
- fails transport evidence tests under NPPF and DfT methodology

In its current state, it cannot be considered sound or relied on for decision-making.
A full, transparent and cumulative transport re-assessment is required.

16. Failure to Consider Relevant NPPF Policies (Selective Quotation)

Summary

This section highlights a serious flaw in the Transport Assessment (TA) and supporting Environmental Statement (ES) submitted for the proposed development at Land North of Taylors Farm. The applicant has selectively quoted from the National Planning Policy Framework (NPPF), relying solely on paragraphs 109–118, while omitting several critical policies that must be considered when assessing transport, environmental, and spatial impacts. This omission presents an incomplete and therefore misleading policy basis for decision making.

The NPPF must be read as a whole. Decisionmakers cannot rely on the applicant's selective extracts, and the TA cannot be considered robust or compliant with national policy.

1. Omission of NPPF Paragraph 8 – The Three Objectives of Sustainable Development

The NPPF requires that all development be assessed on the basis of:

• the economic objective;

• the social objective; and

• the environmental objective.

The applicant quotes only the sections that support economic development, ignoring the environmental and social harms identified in their own ES, including:

• a "Moderate Adverse / Significant" operational road safety impact on the B1256;

• harm to the rural environment and tranquility;

• impacts on NMU safety and accessibility.

These are fundamental to the sustainability test.

2. Omission of NPPF Paragraph 15 – Requirement for a Plan Led System

Paragraph 15 states that the planning system must be genuinely plan led. The proposed site is an emerging allocation (Regulation 19) and forms no part of the adopted Local Plan. Selective reliance on emerging policy without acknowledging that the adopted plan carries full legal weight is misleading.

3. Omission of NPPF Paragraph 32 – Requirement for Proportionate, UptoDate Evidence

Paragraph 32 requires decision making to be based on proportionate, robust, and up to date evidence. The TA fails this requirement because:

• no collision modelling has been undertaken;

• no operational Road Safety Audit has been provided;

• no quantifiable evidence is presented to show that mitigation would remove the Significant road safety impact identified in ES paragraph 8.7.16;

• baseline NMU assessments are incomplete.

4. Omission of NPPF Paragraph 104 – Protection of Sensitive Routes and Environmental Impacts

The NPPF requires transport impacts to be balanced against impacts on environmentally sensitive locations and public rights of way. The site is adjacent to Hatfield Forest SSSI and the Flitch Way (LNR). These considerations are not acknowledged in the TA.

5. Omission of NPPF Paragraph 180 – Protection of SSSIs

Paragraph 180 states that development should not normally be permitted where it would harm an SSSI. The ES contains no assessment demonstrating that the development would avoid harm to Hatfield Forest SSSI, located ~100m from the site.

6. Consequences of Selective Quotation

By omitting key NPPF provisions, the Transport Assessment:

• fails to comply with national policy;

• presents an incomplete policy framework;

• cannot be relied upon by the planning authority;

• requires clarification or resubmission under the EIA Regulations.

<u>Conclusion</u>

The applicant's use of only NPPF paragraphs 109–118 presents an incomplete and selective interpretation of national policy. To comply with the NPPF, the Transport Assessment must consider all relevant paragraphs, particularly those covering environmental protection, plan led decision making, evidence based assessment, and the protection of sensitive sites and transport corridors. Given these omissions, and the Significant adverse road safety impact already identified by the applicant, the proposal fails to comply with several core NPPF requirements and should be refused.

17. Appendix A – Interpretation of ONS WU03EW Commuting Data

Summary

Appendix A (ONS Table WU03EW – Location of usual residence and place of work by method of travel to work) presents 2011 Census commuting patterns for people working in the Takeley/Priory Wood area (MSOA E02004596: Uttlesford 006) and across Uttlesford district. The data demonstrates that the area is already overwhelmingly car-dependent, making the applicant's assumed 20% reduction in car trips highly optimistic, unsupported, and inconsistent with historic mode share evidence.

Key points:

- For Uttlesford 006, 8,290–8,457 workers travel by car/van — around 80% of the workforce. Very small proportions use public transport, cycling or walking.
- Across Uttlesford district (~30,624 workers), ~75% drive, with a further ~5% travelling as car passengers. Public transport and active modes represent only a minor share.
- Workplace origins span a wide and dispersed catchment — Bishop's Stortford, Braintree, Chelmsford, Harlow, Colchester, London and rural Essex/Herts — where viable non-car alternatives are limited or unavailable.
- Given the current car-dominated travel patterns and spatial geography of commuter origins, the assumption that the proposed development could deliver a 20% car mode shift uplift lacks credible justification, mechanism, or supporting evidence.

Conclusion:

The ONS commuting dataset confirms that local employment travel behaviour is fundamentally car-led, and that the Transport Assessment's modal shift projections are over-ambitious and unrealistic. Traffic impact assessments should therefore use realistic, evidence-based car trip rates, not speculative reductions premised on unfunded or uncommitted behavioural change measures.

18. Review of Section 13: Capacity Assessment Summary – Misleading and Unsupported Claims

Summary

This section provides a detailed review of Section 13 of the Transport Assessment. Every key claim made in this section is contradicted by the developer's own modelling results, including those in the Priory Wood and M11 Junction 8 modelling files.

1 – Claim: "No significant impact on any junction"

This is demonstrably false. The Priory Wood Roundabout modelling shows:

• RFC up to 1.50

• Queues up to 182 PCUs

• Delays up to 579 seconds

• Model errors ("circulating flow is zero")

The Four Ashes Junction also shows:

• 96–98% saturation

• Queues of 100–120 PCUs

• Severe delays (2+ minutes)

Calling these impacts "negligible" is not credible.

2 – Claim: "Priory Wood Roundabout is within capacity in all scenarios"

Not true. Priory Wood modelling shows severe overcapacity and repeated model errors. PM peak failure appears in all development scenarios.

3 – Claim: "Mitigation resolves impacts at M11 J8"

The M11 Junction 8 modelling PDF shows:

• Lane saturation exceeding 100%

• Queues up to 180 PCUs

• Delays over 130–180 seconds

The applicant hides this by publishing only PRC totals, not lane-by-lane saturation. This is misleading.

4 – Claim: "Impacts are negligible even with Stansted 51mppa"

There is no modelling in the PDFs supporting this statement. Priory Wood and M11 J8 fail even without airport expansion. Adding 51mppa traffic clearly worsens congestion.

5 – Claim: "Vision-led reductions improve junction performance"

This relies entirely on a fictional 20% traffic reduction. This reduction:

• Is not evidenced

• Cannot reduce HGV or courier van trips

• Cannot affect shift-worker traffic

• Is not deliverable for logistics operations

This is not realistic or compliant with NPPF paragraph 115.

6 – Claim: "No severe impact"

The modelling clearly shows severe impacts at:

• Priory Wood

• Four Ashes

• M11 Junction 8

These meet the definition of "severe" under NPPF 116.

7 – Claim: VISSIM modelling will be done "later"

This is a major red flag. VISSIM is required now, not after approval. This admission alone means the Transport Assessment is incomplete and cannot be relied upon.

Conclusion

Section 13 depends on selective presentation, omission of failing scenarios, artificial traffic reductions, and misleading summaries. All three major junctions show severe impacts. Section 13 is therefore unsound and contradicted by the submitted technical evidence.

19. Review of Section 14: Summary and Conclusions – Misleading and Unsound Claims

Summary

This section provides a detailed review of Section 14 of the Transport Assessment. The conclusions presented by the applicant are contradicted by their own modelling results and do not comply with national policy, particularly NPPF 2024.

1 – Claim: "A vision-led scheme designed to manage vehicle flows effectively"

This is inaccurate. The development is a conventional B2/B8 industrial estate generating high levels of HGV, LGV and shift-worker traffic. Nothing about the land-use strategy reduces the need to travel. The 20% traffic reduction used in the TA is invented, unrealistic and not evidence-based. A scheme dependent on fabricated reductions cannot be described as "vision-led" or "effective".

2 – Claim: "Suitable mitigation at M11 J8 and Priory Wood Roundabout"

The modelling results contradict this:

• Priory Wood Roundabout shows RFC up to 1.50, queues of 182 PCUs and delays of 579 seconds.

• M11 J8 shows lane saturations exceeding 100%, queues up to 180 PCUs and delays reaching 130–180 seconds.

Mitigation does not resolve these failures. The results are only improved by artificially deleting 20% of development trips.

3 – Claim: "Methodology agreed with National Highways and ECC"

Pre-application engagement does not equal endorsement. National Highways requires validated base models and does not accept hypothetical trip reductions or incomplete modelling (e.g., missing VISSIM). ECC also expects robust, accurate models, which these are not. The claim is misleading.

4 – Claim: "Prepared in line with NPPF 2024 objectives"

NPPF 2024 requires development to reduce the need to travel, deliver sustainable movement, and avoid severe cumulative impacts. This scheme increases freight, increases private car use, worsens congestion, and pushes multiple junctions into failure. It does not align with the NPPF.

5 – Claim: "Safe, efficient and sustainable access arrangements"

This is contradicted by the modelling:

• Multiple junctions fail (M11 J8, Priory Wood, Four Ashes).

• Delays reach 9–10 minutes in some scenarios.

• Queues reach 180+ PCUs.

• Modelling errors exist, including “circulating flow is zero”.

• Key assessments such as VISSIM are postponed until after approval.

Under NPPF 116, these represent severe residual cumulative impacts and should result in refusal.

Conclusion

Section 14 is based on selective presentation, omission of failing scenarios, unrealistic trip reductions and unsupported claims of compliance and mitigation. The modelling evidence demonstrates the opposite: the proposed development results in severe impacts across the local and strategic road network. The Transport Assessment does not justify approval and cannot be relied upon for decision-making.

20. Inability to access Flitch Way via Bush End.

Summary

This section challenges the applicant's assertation that the Flitch Way is readily accessible via Bush End.

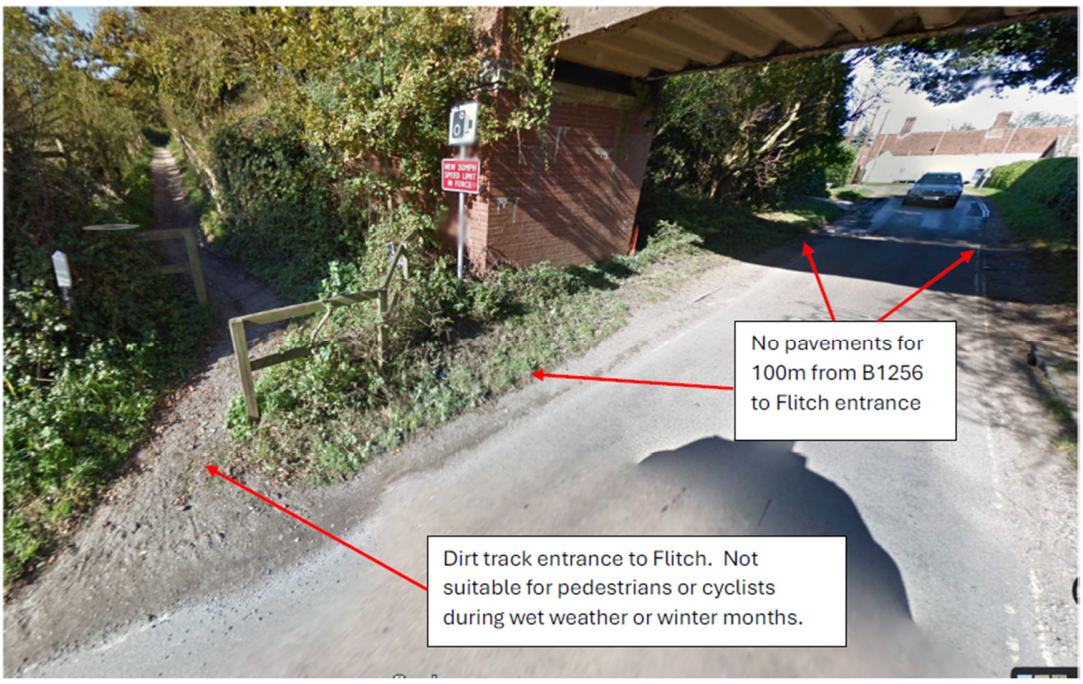
Section 8.3.9 of the developers Transport and Access statements states that *"the Flitch Way can be accessed via Public Bridleway 45 Great Hallingbury which is approximately 600m west of the Site on the B1256 (The Street/Dunmow Road) or via Bush End, which is approximately 1.1km east of the Site".*

While access via Bush End may appear possible when viewed on a map, on-the-ground conditions demonstrate that this route is neither safe nor suitable, particularly for pedestrians, cyclists, and users with disabilities.

The entry and exit to the Flitch Way via Bush End is inherently hazardous. There is no footway or segregated pedestrian provision along the approximately 100-metre stretch of Bush End immediately after leaving the B1256. As a result, pedestrians and cyclists are forced to share the carriageway with vehicular traffic, creating an unacceptable safety risk.

These conditions present an even greater challenge for individuals with disabilities, who require safe, level and predictable routes in order to travel independently.

In addition, the access point itself is in a poor state of repair, with uneven surfaces, surface degradation and a lack of routine maintenance. For much of the year, this makes the route unsuitable for pedestrians and cyclists, and effectively unusable for those with mobility impairments.



The Bush End road, which provides access to the Flitch Way, is also prone to regular flooding beneath the bridge during periods of rainfall. This flooding routinely persists for extended periods and renders the route impassable or unsafe (see photograph taken on 15/12/2025, showing flooding present for over one week).

Conclusion

Taken together, the absence of pedestrian infrastructure, poor surface conditions and regular flooding mean that Bush End cannot reasonably be described as a safe, accessible or suitable access point to the Flitch Way. The applicant's reliance on this route as evidence of connectivity is therefore misleading and does not reflect real-world conditions, particularly for vulnerable users.

21. Overall Conclusion.

1. The **Proposed Access is unsafe and incomplete**, with substandard taper length, junctions spaced too closely, no bus tracking, unenforceable turn restrictions, no pedestrian buffer, no right-turn ghost island and, critically, **no Stage 1 Road Safety Audit to prove that any of it is safe.**

2. The Environmental Statement confirms a **Moderate Adverse / Significant road safety impact on the B1256** — triggering NPPF 116 refusal.

3. The Transport Assessment models **only B2 traffic** despite applying for B2/B8 use, **underestimating HGV movements by ~67%** (~+199/day), and only covers 5am – 9pm (16hrs). As no operational hour restriction exists, the realistic worst-case scenario is 24/7 use, meaning night traffic, noise and safety impacts are unassessed.

4. Modelling assumes a **fictional 20% traffic reduction** to make junctions appear acceptable; no evidence it can be achieved.

5. **M11 J8, Priory Wood & Four Ashes junctions are already near or over capacity** in the Base + Committed case.

6. **Required VISSIM modelling was not provided**, meaning strategic junction impact is unknown.

7. The proposed cycle route **fails LTN 1/20 minimum width, continuity & safety standards**, contains a 120m 2.0m pinch-point, crosses 38 driveways and 5 side roads, and terminates abruptly into live traffic. Delivery is not secured by S106/S278, so may be downgraded, delayed or never delivered.

8. Trip distribution uses **airport-biased MSOA data**, inflating bus/rail mode share and suppressing car/HGV reality.

9. No **comprehensive Travel Strategy** exists — only an aspirational Framework Travel Plan, unfunded and non-binding.

10. **Stansted 51mppa was not fully included in cumulative modelling** (only sensitivity-tested), resulting in an under-assessment of traffic impacts contrary to NPPF requirements.

11. Northside application **removes the M11 fourth-lane capacity LNTF modelling relies upon**, invalidating assumptions.

Conclusion:
The transport evidence is incomplete, unrealistic and materially underestimates impact. The applicant's own modelling confirms Significant safety harm, and key mitigation is neither proven nor secured. Under **NPPF Para 116**, the local authority is required to refuse the application on transport grounds.