

SALISBURY TRANSPORT 2000
Objection to Brunel Link/Harnham Relief Road Planning Application Ref 05/8007

Attachment A: Need, Purpose & Consequences

A.1 The “Need” for the Scheme

A.1.1 “Essential Infrastructure”

The Brunel Link component of the scheme crosses the River Nadder, which is part of the River Avon cSAC, and its floodplain. Under PPG25 (Planning Guidance on Flooding) this needs to be “essential infrastructure” to be located in the floodplain, and, under the Habitats Directive, there must be “no alternative” if there is a significant impact on the cSAC.

It is noted that the Environment Agency have in the past requested that WCC provide written confirmation that the Brunel Link road is deemed to be essential infrastructure as outlined in PPG25, and furthermore “*Supporting evidence for the decision together with the criteria applied should be included with this confirmation*” [EA-030113]. WCC’s case for the scheme seems to rest on the statements that “*the Government Office for the South West recognised the transport case for the Harnham Relief Road and Brunel Link scheme*”, that “*alternatives are not feasible*” and “*the environmental and traffic problems in Salisbury justify the current proposals*” [WCC-0301]

There is a failure to provide any evidence to back up the need for the scheme in the Environmental Statement. The ‘supporting evidence’ and ‘the criteria applied’ which were requested by the Environment Agency have never been supplied. Any comments made by GOSW at the time of the Salisbury Transport Study need to be reviewed in the light of both the much stricter guidance on building in floodplains in the revised PPG25 (see G.1.7), and also of the falling traffic levels in Salisbury City Centre since 1998 (see E.3.1).

WCC have also failed to consider alternatives – this is discussed further in B.6.

A.1.2 Views of the Waste Planning Authority

While WCC as Highway Authority have confirmed that they deem the Harnham Relief Road and Brunel Link to be “essential infrastructure” [WCC-0301] this view does not appear to be shared by the County Council acting as Waste Planning Authority.

In September 2002 the revised deposit draft of the Wiltshire and Swindon Waste Local Plan 2011 was published, and a site on Churchfields (Site L22) was added as a new Preferred Area for Local Waste Management. It was noted that “*access to/from the site to the primary road network*” was one of the planning issues associated with this site. [WSWLP-RDD] Despite this, the Waste Planning Authorities declined to make the site dependent on the provision of the Brunel Link. It was noted in the Inspector’s report that “*Although the County Council supports these road proposals as a means of dealing with traffic problems in the area, the WPAs point out that the inclusion of Site L22 as a preferred area is not dependent upon the provision of these roads.*” [WSWLP-IR, para 5.50.4]

If WCC, acting as Waste Planning Authority, do not consider that site L22 on Churchfields is dependent on the provision of the Brunel Link then clearly they do not consider the scheme to be essential infrastructure.

A.2 HGVs in Salisbury City Centre

A.2.1 Definition of the ‘City Centre’

There are two existing HGV access routes to Churchfields, one is via Fisherton Street and South Western Road to Mill Road then Churchfields Road. The other is via Exeter Street, New Street, Crane Bridge Road to Mill Road and then Churchfields Road. From the statement that “*The only access for vehicles higher than 4.3m is through the city centre via New Street, Crane Street and Mill Lane [sic]*” [S3AR, para 2.2] we take it that only this latter route is being defined as ‘city centre’.

This is further confirmed by the definitions given in the Townscape section of the ES, where ‘Salisbury City Centre’ is defined as the ‘dense medieval core’ [ES, 7.19]. It is clear that the area around Fisherton Bridge is defined as Salisbury suburbs; “*The inner Victorian/Edwardian suburbs enclose the historic city core at Wyndham Park, Fisherton, Devizes Road, Harnham and Milford Hill....the central commercial area extends beyond the city centre along Fisherton Street.*” [ES, 7.23]

There is much confusion throughout the document over the term 'city centre', which has been used to refer to both routes in many cases. For example:

- "HGV access to Churchfields Industrial Estate through the city centre via Fisherton Street, South Western Road and part of Mill Road or via New Street, Crane Street and Mill Lane [sic]" [ES 7.41]
- "As the main access for HGV traffic is through the City Centre..." [ES 15.34]
- "The main HGV access into the estate is through the City Centre..." [ES 15.60]

Given the way that 'City Centre' has been defined all these statements are incorrect.

A.2.2 Quantification of the problem

There is mention of the traffic problems in Salisbury City Centre in 2.3 & 2.4 of the ES, and the NTS explains that the Brunel Link would alleviate "*the problems associated with taller heavy good vehicles having to pass through the City centre to access the estate*" [ES NTS-1]. However an accurate count of HGVs accessing Churchfields via the City Centre route has never been supplied by Wiltshire County Council, nor is there any count of those HGVs which use the City Centre route which are in fact over the 4.3 metre height limit for Fisherton Bridge. **This information is required to establish whether the Brunel Link is "essential infrastructure" as required by PPG25.**

The number of HGVs in excess of 4.3 metres high is likely to be very low – typically only loaded car transporters and a few other overheight lorries. It should be noted that several main roads into Salisbury have the same height restriction (e.g. A36 at Wilton) or lower (A30 at Laverstock).

The figures supplied in the Salisbury Transport Study Assessment Report showed 536 HGVs per 12 hour day accessing the estate via Fisherton Street/South Western Road, and 102 per day accessing via the City Centre (New St/Crane Street) [STS-ARV2, Table 2.3]. However these counts were flawed because all vehicles which were 6-tyre vans or larger were classified as HGVs. The effect, whether intentional or not, was to inflate the size of the 'HGV' problem.

Salisbury T2000 conducted their own 12-hour traffic count in July 2001, from which it was apparent that

- HGVs accessing Churchfields via the City Centre had been significantly over-counted in the figures used in the Assessment Report. Counting 6-tyre vans and non-HGVs as HGVs would have more than doubled the actual Churchfields HGV count on the sample day. For the City Centre route, where there are restrictions on HGVs under 4.3 metres high, counting 6-tyre vans and larger as HGVs would have exaggerated the real HGV count by a significantly greater factor.
- On the sample day there were around 10 articulated (& potentially overheight) HGVs each way along Mill Road South/Crane St/New St destined for or coming from Churchfields (2-way count = 21).
- Other HGVs using the City Centre route included quite a number of refuse lorries (from the Churchfields depot).
- On the day in question, about 30% of the HGVs going along the New St/Crane St route were not in fact destined for Churchfields, but were (presumably) en route to/from deliveries in the George Mall or elsewhere in the City Centre.
- A total of 35 HGVs, less than 8% of the total HGVs going to/from Churchfields, took the city centre route on the sample day.

A.3 The Purpose of the Scheme

A.3.1 Original purpose

In the Salisbury Transport Study the Brunel Link is justified as "*the only practical option for providing access to the estate*" [STS-PS, 2.52] and the Harnham Relief Road is then justified since "*additional traffic caused by the provision of the Brunel Link*" would make existing traffic problems in Harnham unacceptable. [STS-PS, 2.55].

The current ES now states that the Salisbury Transport Study "*recognises an existing traffic problem in Harnham resulting from through traffic wishing to avoid Salisbury and traffic accessing the City centre*" [ES, para 2.7). While there is a statement expressing some support for a Harnham Relief Road in the Salisbury Transport Study Summary of the Preferred Strategy "*It is noted that there is a strong case for relieving Harnham from traffic in any case, but this case is made much stronger by the inclusion of the Brunel Link*", [STS-PS, 2.55] this statement is not backed up by any detailed analysis in the Assessment Report.

The need for, or effect of, a Harnham Relief Road was never considered by the Salisbury Transport Study in isolation, it was only ever considered in conjunction with a Brunel Link (combined strategy CS4 and CS12 in the main Assessment report, C2 in the Annexes).

The 'problem' of through traffic in Harnham is not confirmed by Table A1.2 in the Assessment Report, which suggests that only 17% of HGVs and 11% of all vehicles using Harnham Road are through traffic. [STS-ARV1, Table A1.2]

A.3.2 Currently defined purpose

There has been a change of emphasis in the purpose of the scheme since the Salisbury Transport Study reported, reflected in the changing name of the scheme itself. At Stage 2 this was referred to as 'Brunel Link/Harnham Relief Road', but by Stage 3 it had become 'Harnham Relief Road and Brunel Link'. When the purpose of the scheme is described in the current Environmental Statement, traffic relief for Harnham is often defined as the first purpose of the scheme. For example "*The Salisbury Transport Strategy also included local road improvements for Harnham and the Wyllye Valley. In particular, it was proposed that construction of a Harnham Relief Road and the Brunel Link would remove through traffic from Harnham and improve links to Churchfields industrial estate...*" [ES 2.6]

It is implied in numerous places in the Environmental Statement that Harnham has a traffic problem and that there is a need to alleviate traffic flows through Harnham, for instance in paragraphs 2.7 & 9.102, but in fact the case for traffic relief without the Brunel Link has never been made. While one can sympathise with any community's wish to have less traffic, the traffic volumes through Harnham are no worse than many other main roads in Salisbury, as shown by the following statistics.

Road	Traffic volumes 2000	Source
A3094 West Harnham	10024	Table 4.1, 2000 estimated AADT
Castle Street	12411	Table 4.4, 2000 AADT
Fisherton Street	16939	Table 4.4, 2000 AADT
A30 London Road at St Thomas's bridge	17037	Table 4.1, 2000 estimated AADT
Exeter Street	20122	Table 4.4, 2000 AADT
Source: Wiltshire 2000 Travel Report		

If there are felt to be problems of safety and community severance in Harnham then the first thing to put in place would be traffic calming and safe crossing points. An additional pedestrian crossing has been added recently but much more could be done and all possible options should have been thoroughly investigated before concluding that a relief road was the answer.

There even seems to be some confusion over quite where the traffic problem is in Harnham. Having stated that the problem is "*traffic levels along Harnham/Netherhampton Road*" [S3AR 2.1.2] elsewhere it is stated that "*In Harnham there is currently traffic congestion during peak periods, particularly at the Harnham Gytratory where a number of major routes converge.*" [ES App 2.1, p. 3]

A.4 The consequences of the scheme

A.4.1 City Centre

The predicted traffic benefits of the scheme for the City Centre have not been provided with this edition of the ES (there was more information provided in Autumn 2002, but that still did not cover many city centre streets). See our further comments on this in Attachment E (Traffic & Economics) and Attachment H (Errors and Omissions). **This is a major omission, as it provides no way of assessing whether the scheme in fact provides overall benefits to the City Centre, which was the prime purpose of the scheme.**

There are promises that the scheme would "*provide significant benefits to the city centre*" [ES 7.47], and that the scheme "*would facilitate and enhance a range of traffic management and calming measures to improve the environment, health and general safety for people in Salisbury*" [ES 7.49]. However it is nowhere made clear what the benefits will be for Salisbury City Centre, or quite what traffic management and calming measures will be brought in, and such measures do not appear to have been costed as part of the scheme.

The scheme has been justified in cost benefit terms because the Brunel Link becomes a rat run for traffic into the City Centre, removing traffic from the Harnham Gytratory and Salisbury Ring Road to the east of the city. But the consequence is that there is more traffic, not less, on Churchfields Road [S3AR

Figs 5.1 & 5.2]. The consequences for other streets on the western side of the city have not been spelt out (see H.1.2).

A.4.2 Harnham

Traffic levels on the Netherhampton Road to the east of the proposed Harnham Relief junction are predicted to fall by less than 15% (from 11580 to 9880 Annual Average Daily Traffic) with the scheme. [S3AR Fig 5.1]

If the Harnham Gyratory is felt to be the problem area for Harnham (as mentioned in A.3.2 above the specific Harnham problem definition seems to vary) then the benefits are even less clear. Traffic on New Bridge Road and Harnham Road combined is predicted to fall by less than 5%. (Note: It is unhelpful to combine these 2 roads for traffic modelling purposes, see comments on this in H.1.2 also).

A.4.3 Wider Road network

The traffic threat to Downton and the New Forest is spelt out clearly in the supplied traffic figures. In 2008 there is predicted to be 8% more traffic on the A338 High Road with the scheme, by 2023 there is 16% more traffic. [S3AR Figs 5.1 & 5.2] Given the vulnerable nature of the roads through the New Forest, and the heavily protected status of this National Park, there must be the gravest concerns about a scheme which sends even more traffic in this direction.

A.5 Infill Development

The Environmental Statement fails to consider the likelihood of further infill development to the south of Salisbury should this road scheme go ahead. Once the landscape has been downgraded with the road there will be pressure for further housing, and potentially retail and other developments accessed from the relief road. Not only would the whole character of the area be changed and downgraded, but this would further add to traffic congestion to the south of Salisbury.

A.6 “Bypass by Stealth”

Local Conservatives have strongly hinted that they wish to see the Harnham Relief Road continued across the water meadows at Britford, despite the strong protection given to this area. The Conservative and Independent group on Salisbury District Council issued a press release on 21/5/2001 which stated *“Ultimately, Salisbury must have, and will have, a bypass. ... we will continue to press Government for this much-needed road. As far as its route is concerned, we will direct officers to explore all the alternatives, especially in concert with the Harnham Relief Road.”*

Government’s refusal in Dec 2004 to fund a Wylde Valley Relief Road, which had been extended to join the A3094 Netherhampton Road at Park Wall, removes one crucial link in the full bypass by stealth which seemed at one time to be on the cards. But while official denials continue, there is little doubt a southern bypass, crossing the water meadows at Britford, remains an aspiration for many. It may just be a slip of the pen, but Figure 1.1 on the CD version of the Stage 3 Assessment Report shows this road scheme connecting to both east and west-bound A36 routes out of Salisbury....

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Attachment B: Scheme Selection Process and Consultation

B.1 Brunel Link selection process

B.1.1 Introduction

The need for the Brunel Link as the only possible solution to Churchfields access problems has never been established – neither the Salisbury Transport Study, nor the Local Plan, rule out other options. The flawed conclusions drawn from the Salisbury Transport Study are covered in B.1.2 below, while the comments on the scheme in Salisbury District Local Plan are covered in B.1.3. Further details on how the scheme emerged from the Salisbury Transport Study, and the consultation stages which formed part of that Study, are given in B.2 below.

Consultation on the Local Transport Plan, which has consistently shown a public preference for sustainable transport options in preference to road building, is covered in B.3. Section B.4 covers the manner in which the large number of objections made to the earlier planning application for the scheme in Autumn 2002 have been disregarded, and section B.5 specifically covers the requests made by the Statutory bodies, and others, for the alternatives which involve consideration of the long-term sustainability of the Churchfields Industrial Estate to be considered.

Section B.6 looks at the failure to consider alternative solutions for Churchfields, and section B.7 considers the review of the future development options for Churchfields Industrial Estate which Salisbury District Council are currently conducting. Salisbury Transport 2000 have contributed to that ongoing debate in their “Salisbury: The Way to Go” report, which forms Attachment J of this objection (specifically Chapter 6, Churchfields: A New Vision).

B.1.2 Salisbury Transport Study

The statement that the Salisbury Transport Study “concluded that the Brunel Link was the only practical option for improving access to the industrial estate” [ES NTS-3] is not a fair conclusion if one considers the full set of reports produced by that study. Although the Summary of the Preferred Strategy made such a statement [STS-PS 2.52] this was not actually a reasonable conclusion based on what is in the Salisbury Transport Study Assessment Report. This report stated that “*there is no easy solution to HGV access to Churchfields Industrial Estate. In terms of economy the Brunel Link is by far the most attractive option, being around £3 million cheaper than the other alternatives that provide a direct access to the estate.*” [STS-ARV2 2.110]. This assessment of the relative cost-benefit of the Brunel Link was fundamentally flawed as it only considered the £2.3 million cost of the Brunel Link itself, and did not take account of the finding documented elsewhere that “*The Brunel Link on its own (i.e. without Harnham Relief Road) would cause unacceptable additional disbenefits to Harnham. It is considered that this scheme could only be progressed in conjunction with a scheme to relieve traffic in Harnham.*” [STS-ARV2 1.31]. This pushed the total cost of the scheme to £13 million (now increased to £19 million).

Alternative options for Churchfields access were costed as follows:

Increasing clearance on Cherry Orchard Road or Ashfield Road	£4.2 million
Provision of a link between Wilton Rd and Churchfields Rd	£6 - £10 million

[STS-ARV2, Table 2.9]

A question was posed to Salisbury District Council’s Transport & Environment committee on 29/1/2001 noting that if the Harnham Relief Road is being considered as an essential adjunct to the Brunel Link then the combined cost of these two schemes - £13 million - must be considered when making comparisons with alternative proposals for accessing the estate. The minuted response to the question was that ‘*this would be explored in more detail when the public consultation exercise was undertaken.*’ However there was no ‘public consultation’ until the planning application was submitted in October 2002, and although this point was raised then, it has not been responded to. So there has been no opportunity for this discrepancy to be ‘explored in more detail’, and we understand from the Leader of Wiltshire County Council that this round of consultation, on this second planning application, is the round of consultation which is referred to. [WCC-050427, see also B.2.4]

B.1.3 Salisbury District Local Plan

The ES states that “*the Brunel Link is strongly supported by both the adopted and emerging Plans, the Harnham Relief Road does not feature as a specific policy*” [ES NTS-21]. The Salisbury Local Plan was produced in Replacement Deposit Draft form in 1998 and was formally adopted in June 2003.

The Brunel Link itself is the subject of a policy in this adopted plan. Policy TR10 "*The construction of a road and river bridge link between Brunel Road and Netherhampton Road (the Brunel Link) will be sought as a matter of urgency*" [SDC-LP] However the route protected in the Local Plan is not the same as the current proposed route, since the junction with the Netherhampton Road is some 300 metres west of the junction shown in the replacement local plan. The Harnham Relief Road, which is now being promoted as an essential adjunct to the Brunel Link, is not in the adopted plan and has never been considered for inclusion in it.

There is some doubt over the acceptability of the Brunel Link expressed in the Local Plan itself. In the first place there is some support (though not an actual policy) for the conversion of the area to mixed use development:

"Within Salisbury the District Council considers that in view of existing transport problems with accessing Churchfields Industrial Estate, in the long term, the site could have potential for mixed use development, including residential." [SDC-LP, 4.51].

There is also a statement on the consideration of alternative solutions to the Brunel Link:

'Alternative solutions to the accessibility problems of Churchfields will also be examined and promoted if they can be justified both financially and environmentally.' [SDC-LP, 10.42]

The following points should be made in relation to the Local Plan:

- The Local Plan contains only the Brunel Link, and not the Harnham Relief Road. Since the two are now being presented as a single scheme the inclusion of the Brunel Link alone in the plan is of little or no relevance.
- Despite a request from WCC's Transport & Environment Committee on 10/7/2001 that the preferred route be included in the Local plan this has never been taken forward, which means that there has been no opportunity for a proper local debate on the wider land use issues which arise from this scheme. This is contrary to the guidance given in PPG12 which states that "...given a plan-led system, the Government believes it is important that development plans are brought up to date to reflect any changes in strategy, priorities and policies resulting from the first round of local transport plans".
- Planning guidelines on flooding have been revised since the Inspector considered the details of the Local Plan, and the Brunel Link does not pass the criteria set under the revised, and significantly tighter, new guidelines. Development in a flood plain under the latest guidance should be "wholly exceptional" and limited to "essential" infrastructure (see G.1.7). This application does not make the case that this is essential infrastructure – see also our comments in A.1.

B.1.4 Churchfields Estate issues

Problems on the estate are as much about congestion as access, and these problems will only get worse when Churchfields becomes a busy through route. Salisbury District Council's review of the estate estimated that over 560 cars are parked on the estate roads every day, and commented that only three properties on the site had 'excellent' loading access for HGVs and other lighter goods vehicles. Of 147 properties surveyed, 112 had 'poor' or 'average' loading access. [SDC-CR-0410, Appendix 11]. In many cases, HGVs such as car transporters, are unloaded on the estate roads themselves.

The Brunel Link would introduce significant through traffic into this already congested and crowded estate, and the scheme contains nothing which will help to solve the existing problems on the site. The roads – especially Brunel Road – would become busier and more dangerous for pedestrians and cyclists. If the Brunel Link does in fact make HGV access easier it may have the undesirable side effect of introducing even more lorries into this already overcrowded and unsuitable street scene. As has been noted elsewhere, the road scheme will in fact add to journey time and cost for freight traffic – see G.2.3.

B.2 Consultation on scheme from Salisbury Transport Study to present

B.2.1 Salisbury Transport Study Autumn 1999 consultation

The Salisbury Transport Study was set up following the cancellation of the Salisbury Bypass scheme in 1997, and in Autumn 1999 put forward 3 strategies for consultation, of which only one (Strategy C) contained the Brunel Link and Harnham Relief Road schemes (along with 3 further relief roads). Strategies A and B both included "*Provision of a new access for HGVs to Churchfields Industrial Estate by lowering the road under the railway bridge at Cherry Orchard Road*". [STS-L99] The consultation response form asked which strategy was most appropriate, and asked for views on the individual strategy components. There was no question about the Brunel Link/Harnham Relief Road scheme however – these two proposals were not even presented as a single scheme at this stage - only on the strategy of 'building relief roads on the edge of Salisbury'.

It was concluded from the results of this public consultation that a direct link to Churchfields from Wilton Road was a 'safe' option, supported by over 70% of respondents, whereas building local relief roads was 'contentious'. [STS-CR Table 3.4]

Wiltshire County Council have subsequently explained to ST2000 that lowering the road under the railway bridge at Cherry Orchard Road is an "unworkable" option [WCC-021015]. WCC have so far declined to explain why, after two years work on alternatives, an "unworkable" option was ever put to public consultation in autumn 1999.

B.2.2 Salisbury Transport Study Spring 2000 "consultation"

The Brunel Link/Harnham Relief Road emerged for the first time as a single scheme in Spring 2000 when "The Salisbury Transport Strategy" was unveiled. At this stage, despite widespread opposition to the road scheme components from many, including statutory consultees (see B.5.1 below), there was no time or opportunity given for changes to be made to any components of this proposed strategy, which was incorporated into the Local Transport Plan submitted in July 2000.

Additionally, this consultation phase was flawed by the fact that the detailed Assessment reports, on which the conclusions of the Study were based, were not made available to the public. It was not until May 2001 that this 2-volume report (dated April 2001) was finally deposited in Salisbury Library. It should be noted that Salisbury Library has NEVER in fact been in possession of the full set of reports produced by the Salisbury Transport Study – the "Report of Transport Surveys Volume 2" has never been received, and only draft versions have been received for the "Model Development & Validation Report Volume 2", "Report of Transport Surveys Volume 1" and "Report of Transport Surveys Volume 3". [ST2000-030925]

B.2.3 Planning Application 02/1961, October 2002

The public exhibition in Harnham and Britford in October 2002 occurred after the planning application for the scheme had been submitted. A reply paid blank form for comments was available at these exhibitions. No information has ever been released about the results of this 'consultation', nor any report presented to WCC members on the number and nature of the representations received to the planning application, which was subsequently withdrawn in January 2005.

Nearly 600 objections were received to the October 2002 planning application. All four statutory bodies (Countryside Agency, English Nature, English Heritage and the Environment Agency) expressed strong opposition to the scheme (see B.5.2 below).

B.2.4 WCC views on adequacy of consultation to date

WCC have made claims to ST2000 that the Brunel Link/Harnham Relief Road scheme has been the subject of a "detailed consultation". The Assistant Director for Planning and Development, for example, has made the following statement: "*In the case of the Harnham/Brunel schemes, I am satisfied that there has already been a very long period (some 5-6 years) of detailed consultation and the proposals are clearly articulated in policy documentation and in the GOSW's 'Salisbury Transport Study'; all of which were subject to considerable consultation in their own right*". [WCC-050428]

The above view does not seem to be shared by all at WCC. When ST2000 wrote to the Leader of the Council in April 2005 asking when consultation referred to by SDC and GOSW would be occurring [ST2000-050404] they received the response that "*The revised application has recently been submitted ... there will be a consultation period for comments to be made ... while I cannot speak for Salisbury District Council or the Government Office, I imagine that their representatives were referring to this consultation in the instances you cite*". [WCC-050427]

B.3 Public views on 'road building' solutions

There was wide-ranging consultation on the first Local Transport Plan, which covered the period from 2001/02 – 2005/06. As the LTP itself reported "*The consultation processes have consistently identified Public Transport, Maintenance, Walking and Cycling as the top priorities for investment*." [WCC-LTP1, p.47]. Despite this, the 2000 Final LTP had a higher percentage of the total funding allocated to new roads than the 1999 Provisional LTP, due to the inclusion of the Salisbury road schemes in that second document. [WCC-LTP1, Table 4.5.1 & p. 47],

Wiltshire County Council have subsequently claimed that although County-wide consultation has consistently put construction of new roads as a low priority the "*findings of consultations undertaken as part of the development of integrated area-based transport strategies were more mixed and indicated*

that roads were given a higher priority where they were seen as necessary to overcome local environmental and traffic problems” [WCC-APR-2002, p. 28]

However, as an analysis of the Salisbury Transport Study Consultation outlined in B.2 above will show, high levels of support for road building have only been obtained when no alternative options are put forward to solve a problem – the initial consultation in 1999 showed 70% favouring a non-road building solution to Churchfields access problems.

It is noteworthy that, as the amount being spent on this road scheme continues to rise, with ‘Preliminaries’ now estimated to cost £3.79 million, the walking and cycling budget for Salisbury in 2005/06 has been cut to zero. This despite the fact that the Salisbury Transport Study promised “*the provision of cycle routes on all radial corridors into the city centre*”, and this has not been delivered. [STS-PS, 2.35]

B.4 Developments post Planning Application S/02/1961

Given that the changes made to the route have been described as “minor” [WCC-050427] it seems somewhat surprising that the decision was taken to withdraw the previous planning application (S.02.1961) rather than simply issue documents to cover the change in route. There can be no doubt that the poor quality of the original Environmental Statement, with numerous missing and incomplete sections and reports, was also a factor in this decision. The current Stage 3 Assessment report indicates that this decision was taken “*in consideration of the archaeological findings, of the work involved in conducting further investigations and assessments relating to these and other comments, on the advice of County Council’s Planning Officer*” [S3AR, 1.2].

Whatever the reasons for the resubmission, WCC’s behaviour in failing to publicise this resubmission have been deplorable. The contrast with the previous submission in October 2002 is stark - in October 2002 there were public exhibitions in Britford and Harnham, 8 weeks consultation period was allowed, and the Environmental Statement cost a modest £150. In April 2005 there were 3 weeks allowed for comments, extended to 5 weeks only because WCC inadvertently forgot to advertise the scheme as a ‘departure’ application, there were no public exhibitions, and the Environmental Statement cost £300. Or at least it was advertised as costing £300, but this quoted price did not include the Stage 3 Assessment Report which forms a key part of the Environmental Statement and which has to be obtained direct from the consultants responsible for producing it. An additional £20 secures a CD version of that report, but it is not possible to obtain a legible print out of the technical drawings in the Assessment Report from that CD.

Furthermore the large number of people and organisations who submitted representations to the Autumn 2002 planning application were not informed of the resubmission of the planning application. Most had not been told that the previous planning application had been withdrawn either, and would have been unaware that their earlier representations would now be disregarded.

The 2005 planning application was not publicised through a notice, press release, or in any way on the WCC website, despite the fact that the ‘draft statement of community involvement’ which was consulted on in Autumn 2004 indicated that these steps should be taken. WCC have explained that website improvements are required before the proposal can be advertised online and that no press release has been issued because “*the capacity ... does not currently exist because of prolonged staff shortages within the Development Control Group coupled with a heavy workload*” [WCC-050524]

Wiltshire County Council’s actions may comply with statutory minimum requirements. However, it was only in March 2005 that the Council were awarded ‘Beacon’ status for ‘Getting closer to communities’, with the WCC spokesperson announcing that this “*shows that the hard work we are doing to involve local people in local decisions is working and Wiltshire’s residents are beginning to get their voices heard on decisions that affect them*”. The County Council’s behaviour over this planning application is in no way appropriate behaviour for a so-called ‘Beacon’ council.

B.5 Comments from the Statutory Bodies

The Statutory bodies have consistently opposed these proposals at the different consultation stages where this scheme has been put forward, as the following sections show.

B.5.1 Spring 2000 Salisbury Transport Study consultation

English Nature: "As a general comment, English Nature would not endorse the proposals as part of an intentional or unintentional staged programme of relief roads to by-pass Salisbury in the long term... The Brunel Link is likely to have a significant effect on the River Nadder... if the findings of an appropriate assessment as required by the Habitats Regulations confirm an adverse impact from the scheme, then English Nature would object unless it can be proven that there is no alternative solution or there is overriding public interest." (English Nature, 23/6/2000)

Environment Agency: "Turning to the Brunel Link, we are concerned that there is a presumption that this road is unavoidable. We would point out that the Environmental Impact Assessment has still to be undertaken on the road and the outcome is by no means a certainty... we have already made representations to Wiltshire County Council as to our concerns over the long-term sustainability of the Churchfields Industrial Estate. We would be loathe to endorse your report without recognition of these concerns." (Environment Agency, 16/6/2000)

The Countryside Agency: "As it stands, the preferred strategy does not appear to warrant inclusion in the Wiltshire Local Transport Plan" (The Countryside Agency, 19/6/2000)

B.5.2 Planning Application October 2002

There was no further public consultation on the scheme before the submission of a planning application in October 2002. Again the statutory bodies voiced their concerns:

English Heritage: "Therefore, because of the lack of information vital to the determination of this planning application, English Heritage object to this scheme" (English Heritage, Nov 2002)

English Nature: "English Nature wishes to register a holding objection on the following grounds:

- Lack of Appropriate Assessment (AA)
- Risks to the River Nadder cSAC/SSSI that have not been adequately covered by the Environmental Statement (ES) and AA
- Lack of Construction Environmental Management Plan (CEMP)
- Inadequate survey data for bats

English Nature considers that the Environmental Statement for this proposal does not fully consider the long term impacts and future development implications of this scheme, nor does it adequately consider alternative solutions to the traffic issues in the context of sustainable development." (English Nature, 28/11/2002)

Environment Agency: "The Agency wishes to return an objection to the proposal on the basis that there is not enough information provided to allow proper assessment of the environmental impact of the scheme... the main concerns are ...

The Agency considers that insufficient reference is made to the sustainability of both the Churchfields Industrial Estate and the Brunel Link....

The application makes insufficient reference to alternative options...

Until this information on alternative options is presented the Agency has no way of assessing whether the Brunel Link Road is essential infrastructure (a key consideration of PPG25) and whether the development is justifiable."

(Environment Agency, 4/12/2002)

Countryside Agency: "...we do not believe that these current proposals should be part of any long term sustainable strategy for the management of transport in Salisbury. The proposed schemes will have a serious impact on the Nadder Valley and the countryside to the south of Salisbury. They will increase HGV traffic on the A338 and will inevitably create pressure for a route to the A36 across the River Avon – a route which has been proven to be extremely damaging for the unique cultural environment of the City.

The Agency believes that a more sustainable option for Salisbury has to be the re-siting of the Churchfields industrial estate. Though we recognise that this would be no easy task, the alternatives presented so far do not provide a long term solution of the quality that this superb city deserves." (Countryside Agency, 22/11/2002).

B.6 Alternative solutions

B.6.1 Overall Failure to Consider Alternatives

A WCC internal memo of 17/2/2003 pointed out that the previous ES "draws heavily on the findings and conclusions of the Salisbury Transport Study, but does not include any information that supports the

conclusions that were reached. The ES simply states that the alternatives are not feasible. Therefore, further information is required to explain why other alternatives to relieve Churchfields are not feasible. Such information should expand upon the information already provided in the ES" [WCC-030217]

Both during the Salisbury Transport Study and subsequently, there has been a consistent failure to consider both alternative solutions, whether large-scale and long-term or small-scale and immediate. One of the problems is that WCC have taken the line that a solution is not worth trying unless all HGVs can be kept out of the City Centre. For example, in relation to relocation of part of the Estate "*it would be difficult to ensure that replacement uses do not themselves generate unwanted heavy goods vehicle movements ... a route through the city centre would still be required, even if its usage was reduced. The enforcement of traffic regulation orders where there are an appreciable number of exceptions to the order are often difficult to enforce, and may not be effective" [ESV3 App 2.1, p.13]. This sort of argument does not hold water, as the city centre route is already used by lorries which need to deliver to city centre premises – Salisbury T2000's traffic count referred to in A.2.2 ascertained that some 30% of HGVs using Mill Road South were not in fact travelling to or from Churchfields at all.*

The Appendix (2.1) provided on 'Main Alternatives Considered' does not adequately consider a number of issues, such as the following:

- How many HGVs in excess of 4.3 metres high need to access Churchfields on a daily basis?
- Which businesses on Churchfields account for the HGV movements to and from the estate?
- Where do workers on Churchfields currently commute from to reach their employment? There is concern that relocating businesses could result in employees having to travel further, but this is speculation without any analysis of where employees currently reside.
- There is mention that the Salisbury Transport Study considered Fugglestone Red and Old Sarum as being potential alternative sites for Churchfields [ES, App 2.1, p12], but there is no mention of Solstice Park at Amesbury which is now being developed. Facilities such as the HGV Testing Centre, which need good access to the trunk road network, would be better placed at a location such as this.
- The discussion on relocation considers redevelopment for housing, and not redevelopments (such as a hotel/conference centre, or a university campus) which could provide significant employment opportunities without generating large numbers of HGV movements.

B.6.2 Long Term Alternatives

Despite the pleas by the statutory bodies and others for a long-term view of the future of the estate to be taken, the leader of WCC has stated they have no interest in considering these alternatives "*Much of the preparatory work has been completed and I see no merit in delaying for consultation on a highly speculative and long-term alternative for the future of Churchfields. There has already been wide ranging consultation on Brunel Link and Harnham Relief Road and the time has come for action, not prevarication" [WCC-050316] (Noting that in a subsequent letter the leader of WCC subsequently agreed that we were in fact only now entering the consultation period which had been referred to by others since 2001 – see B.2.4 above).*

However, a review of future options for Churchfields Industrial Estate is being progressed as a priority by Salisbury District Council – see B.7 below – and it seems quite extraordinary that anyone should think it makes sense to attempt to progress this road scheme before that review is completed.

B.6.3 Short Term Alternatives

There is a failure to look at smaller scale measures which might, in the short term, help to reduce the issues around HGV access to Churchfields.

These include:

- Options to unload car transporters somewhere on the north side of the railway line, for example on Wilton Road, and to transfer cars to smaller vehicle transporters or drive them to garage showrooms on Churchfields.
- Options to ease the HGV access problem at Fisherton Bridge, such as traffic lights, perhaps triggered by HGVs, to avoid conflicts at the bridge itself. Or it might be possible to improve visibility by realigning the bridge abutments.
- The difficult mini roundabouts on South Western Road/Mill Road could be removed if Churchfields Road was rerouted through the station forecourt. This would also remove traffic from Churchfields Road houses. This modification is covered in Salisbury Transport 2000's "Salisbury: The Way to Go" report, submitted as Attachment J of this objection. (see Attachment J, 5.3.2.2).

B.6.4 Other Possibilities

Use of Rail Freight

The ES states that "*The Salisbury Transport Study has indicated that this is not a feasible option for Salisbury*" [ES 15.29]. However, the STS did not look at the specific issue of whether Churchfields businesses could switch to using rail freight, instead it undertook a more general study looking at the goods movements carried by road to, from and through Salisbury and the overall potential for HGV traffic to transfer to rail. [STS-ARV2 Annex C]. Some of the conclusions which were drawn in this report do not apply when one specifically considers Churchfields traffic – for instance the comment that the site for an intermodal terminal near Salisbury station would have poor access to the road network. If one could consider an intermodal terminal on the unused area in the former western goods yard then there could be easy access to the businesses on Churchfields Estate. If cars were transported by rail, rather than road, to the numerous garages on Churchfields this could enormously reduce the number of HGVs in excess of 4.3 metres high which need to access the estate.

B.7 SDC Review of Churchfields Industrial Estate

One of Salisbury District Council's three strategic priorities in their economic development strategy is to undertake an options appraisal for the future development of Churchfields. The first stage of this work, a Review of the Churchfields Industrial Estate [SDC-CR-0410] was completed in October 2004. As reported to SDC Cabinet on 11/5/2005, "*the South Wiltshire Economic Partnership and other representatives of the local business community have expressed a wish that the development of options for the future of the Churchfields Industrial Estate should be progressed as a priority*" [SDC-Cab-050511].

Any decision on transport infrastructure requirements for the Estate should clearly await the outcome of the options appraisal for the future of Churchfields. For WCC to try and press ahead with this unpopular and destructive road scheme without waiting for the outcome of review is a waste of time and taxpayers money. Far from providing any benefit to Churchfields, this scheme would irretrievably damage the potential offered by its peaceful riverside location and absence of through traffic.

Attachment C: Environmental Impacts

C.1 Air Quality

C.1.1 Local Air Quality

The Air Quality assessment fails to cover all the links where traffic is predicted to change by 10% or more [ES, NTS-5]. Traffic predictions are not supplied for many roads where they are needed, particularly in the city centre (see H.1.2) so it cannot be established whether these roads would meet the criteria for inclusion in the assessment. Given the benefits the scheme is alleged to provide the City Centre it is surprising that the ES has not seen fit to investigate the changes in air quality which might affect city centre streets. It is noted [ES 3.32] that Exeter Street has been declared an AQMA, and it might have been thought appropriate to include this in the Air Quality assessment, as it forms part of the City Centre route (although, as noted in G.2.5, traffic reduction in Exeter Street was predicted in October 2002 to be minimal, however figures have not even been supplied with this ES).

From the traffic figures which have been supplied it seems that Churchfields Road should have been assessed, as it has an 11.79% increase in traffic in 2008 [S3AR Fig 5.1]. Figures for Brunel Road have not been supplied, but with 14,790 vehicles a day crossing the Brunel Link there will clearly be a substantial rise in traffic with implications for air quality as well as congestion and safety.

It is claimed that “*existing traffic flows in Salisbury City centre and the surrounding road network result in congestion, noise and reduced air quality*” [ES 2.3], and it is implied that these proposals will “*reduce the impact of traffic-related problems in Salisbury..*”. However, the air quality chapter concludes that there is predicted to be a negligible change in the opening year in both NO₂ and PM₁₀ concentrations, with Air Quality Strategy objectives being achieved both with and without the scheme. [ES 3.50, 3.52, 3.57, 3.59].

C.1.2 Greenhouse Gases

We note that a preliminary assessment in the Salisbury Transport Study estimated that there would be a 2% rise in CO₂ emissions as a result of the Brunel Link/Harnham Relief Road scheme. [STS-ARV2, Table 1.14] It is now predicted that the scheme would lead to a 12.77% rise in CO₂ emissions, with a predicted 4847 tonnes per year without the scheme and 5466 with the scheme in the opening year. [ES 3.65] This is dismissed as being unimportant in relation to the overall UK road transport emissions of CO₂. However it should not be dismissed in this manner when climate change is becoming increasingly recognised as the most important issue of our age, and when the UK is committed, by signing up to the Kyoto protocol, to cutting its CO₂ emissions.

The WCC Environmental Statement included as Appendix A of the Draft Construction Environmental Management Plan says that the County Council “*has an important role taking a lead in supporting sustainable development in the County of Wiltshire*”. There is no way that this scheme can be considered “sustainable development”, the increase in CO₂ emissions being just one aspect of a scheme which fails to meet environmental goals across the board.

C.2 Cultural Heritage

The assessment scores which have been assigned seem to significantly and consistently downplay the impacts of the scheme. For example, in relation to the trackway and hedgerows along the south bank of the River Nadder, it is noted that these are “important hedgerows”, interpreted as forming “*an integral part of the pre-Parliamentary enclosure field system (pre 1845)*” [ES 4.32]. It is then noted that “*the proposed bridge piers of the Nadder crossing would damage the trackway and important hedgerows*”, but that “*for these the magnitude of impact is negligible*” [ES 4.95]. The definition of magnitude of impact given earlier [ES 4.12] defines “negligible” as “No change to a site”, and clearly this is not the case. It seems that a stretch of hedgerow under the bridge, and 5 metres either side will be cleared – hardly a negligible impact.

The overall conclusions, that the impact will be “neutral” for archaeological resource, “slight beneficial” for the built heritage and “neutral” for the historic landscape, do not follow from what has been described in the chapter:

- There are numerous predicted impacts on archaeological remains – in one case, the magnitude of impact on the individual features in a regionally significant Neolithic site is described as ‘medium’, and the impact on a locally significant Bronze Age barrow is ‘high’. [ES 4.89].
- The definition of ‘neutral’ in Table 4.1 is that the proposals maintain existing historic character, have no appreciable impacts on any known heritage assets etc.
- PPG16 protects the setting of archaeological remains, as well as the remains themselves, and the setting of the Woodbury monuments would be adversely impacted by the scheme.
- The point is made that a full archaeological evaluation as the construction proceeds will facilitate other cultural heritage objectives. However, Structure and Local plan policies are clear that there should be a presumption in favour of the physical preservation of archaeological and historic remains in situ [ES 15.82, ES 15.85], whether of national, regional or local significance.

An ‘Archaeological Mitigation Strategy (RPS, 2005)’ is referred to in the Draft CEMP [ES, App 16.1, App C, SEP Cultural Heritage] and elsewhere but has not been included in the ES. Given the archaeological importance of the area through which this road scheme passes this is a major omission.

C.3 Ecology and Nature Conservation

C.3.1 Impact weightings and ecological surveys

It has been shown that more extensive surveys, such as those for bats, invertebrates and Desmoulin Whorl Snails, reveal additional species and in greater numbers than originally found and this should indicate the importance of more thorough investigation before assessing the impact of this road scheme.

The quantity and quality of ecological surveys can, if not questioned, result in the wrong conclusion being drawn when determining the impact. The admission under breeding bird surveys bears this out “*the apparent decrease ...in breeding species between 2002 and 2004 is not thought to be as a result of a decline in diversity of species utilising the site at Harnham, but more a reflection of the differing effort between the two surveys...*”. [ES App 5.11, 5.8]. Also, it is noted that no barn owls were spotted during any of the five surveys undertaken during April-June 2002, but that “*one barn owl was sighted during a bat survey conducted in September 2002*” [ES 5.141].

The weightings which are assigned to ecological impacts are questionable, and there seem to be inexplicable differences between impact weightings in the Environmental Statement in 2002 and currently. The following tables show some of these discrepancies:

Assessment of Effects: Habitats		
Feature	Impact (2002)	Impact (2005)
River Avon cSAC	‘no effect on the integrity of the River Avon cSAC’ [RPS-ES-0209, 5.327]	‘some minor negative effect on the integrity of the River Avon SCI’. Significance of impact: Slight Adverse [ES, 5.273]
County Wildlife Sites	Fitzgerald Farm Meadows & Nadder Island ‘likely to be slight adverse’, Harnham Water Meadows ‘slight adverse’ [RPS-ES-0209, 5.329]	‘..impacts on the County Wildlife Sites ..likely to be neutral’ Significance of impact: Neutral [ES 5.275]
Marshy Grassland	‘The grassland to the south of the Nadder is of some conservation value ...impact ..is assessed as moderate adverse’ [RPS-ES-0209, 5.331]	‘The grassland to the south of the Nadder is of some conservation value ...impact ..is assessed as slight adverse.’ Significance of impact: Slight Adverse [ES, 5.278]

Assessment of Effects: Fauna		
Fauna	Impact (2002)	Impact (2005)
Terrestrial Invertebrates	‘..the loss of invertebrate habitat of county importance...overall impact is considered to be moderate adverse’ [RPS-ES-0209, 5.338]	‘loss of wet woodland and associated riparian habitats...considered to be of county importance for terrestrial invertebrates... Significance of impact: Slight Adverse [ES, 5.289]
Birds	‘The proposed scheme would result in the loss, fragmentation and disturbance of habitat...residual impact is likely to be moderate adverse’ [RPS-ES-0209, 5.342]	‘There would be disturbance and habitat fragmentation affecting all breeding and other birds ... significance of impacts ... minor adverse. Significance of impact: Slight Adverse [ES 5.294]

C.3.2 Appropriate Assessment

The River Nadder is part of the River Avon candidate Special Area of Conservation (cSAC), and the Habitats Regulations 1994 require that an Appropriate Assessment must be undertaken in respect of any project which either alone or in combination with other plans or projects would be likely to have a significant effect on a cSAC. As WCC's internal memo of 17/2/2003 pointed out [WCC-030217] this was not produced as part of the last planning application, nor does it form part of the material supplied with this current planning application.

This major omission is in spite of the fact that additional surveys carried out since 2002 further reinforce the conclusion made in that application that the River Nadder site is of very high habitat quality with an overall HQA score within the top 1% of similar chalk river sites in the country. [ES App 5.6, 5.1].

The ES states that the scheme would have a 'minor negative effect' on the integrity of the River Avon SCI [ES 2.273], and, for an impact of this magnitude "*in the case of Natura 2000 sites a further appropriate assessment may be necessary if detailed plans are not yet available*" [ES 5.270, Table 5.7].

C.3.3 Woodland and hedgerows to the south of the Nadder

The ES is typically unclear about the likely impacts on the woodland and hedgerows on the south of the River Nadder. Both woodland and hedgerows are recognised as being key habitats – the hedgerows (numbers 24 & 25) were the only two identified as 'important' under the 1997 Hedgerows Regulations. [ES, 5.58]. Of particular concern is the loss of wet woodland where 60% of the terrestrial invertebrates recorded along the whole route were found including 2 red data book species and 4 Nationally Notable fly species [ES 5.91-5.93]. This woodland area is recognised as being "*of national ecological significance for foraging to many species of bat and supports two species on the priority list for the UK Biodiversity Action Plan (Barbastelle bat and Pipistrellus sp)*". [ES App 5.14, Annex 2, 5.1].

In recognition of the importance of these habitats, the ES indicates that "*only trees required to be removed for the construction process would be lost*" [ES 5.201], and "*Loss of hedgerows would be limited to that essential to accommodate the scheme*". [ES 5.214] However, as far as can be ascertained, this will involve clearing a swathe through both woodland and hedgerows of the width of the bridge, and 5 metres each side to allow access [ES 5.185]. This does not comply with the statement that "*The commuting route in this area would be retained...through the retention and enhancement of the existing understorey up to the bridge structure.*" [ES 5.257]. The promised programme of general habitat improvements "*through filling gaps in adjacent hedgerows and tree planting*" seems woefully inadequate when two important and centuries old hedgerows would be decimated. It is also pointed out that the wet woodland and associated riparian habitats at the river crossing "*cannot be re-created*". [ES App 5.7, 5.1.1].

C.3.4 Impact on protected species

Evidence has been found of the presence of otters and water voles, both protected species and priority species in the UK and Wiltshire BAP. Damage to their habitat can only be justified if there is over-riding public interest.

Similarly, all bat species are protected under the Habitats Regulations (1994) as well as the Wildlife & Countryside Act (1981). Bat breeding and resting places are protected from destruction, and bats are protected against "disturbance". In the woodland to the south of the River Nadder (Site 1), 10 species of bat have been identified, including the two UK BAP "Action Plan" species mentioned above, and the potential impacts are identified as:

- "*Bat commuting route fragmentation/avoidance from road crossing/bridge over woodland and wetlands and lighting*
- "*Habitat (feeding/roosting) destruction from road construction*
- "*Bat killing/injury through felling of trees containing small roosts*
- "*Bat road kills from road traffic crossing bridge*" [ES App 5.14, Annex 2, 5.5]

There can be no confidence that the mitigation measures proposed will satisfactorily address these impacts – there is mention only of "reducing" adverse impacts through road kills [ES, 5.256], and the promise that the understorey would be retained up to bridge structure is at variance with the statement in several places that trees and hedgerows under the bridge, and for 5 metres each side, will need to be cleared for construction and access. The overall assessment score for bats, taking mitigation into account, is considered to be "*Moderate Adverse*". [ES, 5.303].

If bats are to be adversely affected by this scheme, as it seems they will be, then under the Habitats Directive the scheme should only proceed if it is "*for public health or public safety or other imperative*

reasons of overriding public interest including those of a social or economic nature... [ES App 5.14, Annex 2, 1.5].

C.4 Traffic Noise and Vibration

It is noted that overall 183 fewer people would be annoyed by traffic noise with the scheme (ES, 9.94). However this figure appears to have been arrived at by ignoring the not inconsiderable numbers who live in the Hospital's accommodation blocks or at the permanent travellers' site nearby. These sites, together with the Hospital itself, would both experience "*a moderate to large adverse impact*" (ES, 9.98), however since they are defined as 'non-residential receptors' the number of individuals concerned is not taken into account. In the Hospital accommodation block many staff who work shifts will be trying to sleep during the daytime, when there will be more traffic and noise both during construction and operation and the road scheme would have a major adverse impact for staff.

The increased height of the Brunel Link in the latest planning application will increase the noise nuisance experienced by residents in West Harnham. It is noted that "*It will be difficult to screen the viaduct section of the road from the housing at West Harnham by planting close to the viaduct as this could cause an obstruction to floodwater*" and that affected householders may be offered off-site planting in their gardens [ES 6.136].

C.5 Flood Risk and Drainage

The calculated compensation storage volume only takes account of the maximum volume of existing floodplain that would be occupied by the embankment [ES, 13.11]. It is estimated that this would reduce by 380m³ the flood storage currently provided. It is concerning that no account seems to have been taken of the potential effect which the piles and bridge piers may have in terms of removing underground water storage. The impact of these structures on ground water levels and flows is crucially important, given that groundwater saturation is believed to be one of the flooding mechanisms which affects the village of Netherhampton. [ES, 13.30].

There is concern that trees planted close to the viaduct "*could cause an obstruction to floodwater*" [ES 6.136] but the somewhat more substantial barriers presented by the bridge piers and underground foundations and piles are given little consideration.

The Stage 3 Assessment Report mentions the requirement to construct a 'temporary causeway' alongside the viaduct, which would need to be capable of use by 'heavy' vehicles [S3AR, 4.7.2.2]. The wheeled and tracked excavators which are mentioned '*are likely to be between 15t to 30t*'. [ES 16.20] A crane, of 'up to 1000 tonnes' would be required to allow the installation of the main river beams. It is not clear that the 'temporary causeway' which has been planned has been designed with the weight requirements of the largest construction vehicles in mind, nor does thought seem to have been given to the difficulties if the work is scheduled when the ground is flooded or waterlogged.

A 'temporary causeway' across the floodplain would be required, presumably for the 12 months or so that the bridge would take to construct. Because of the high water table and poor quality of the underlying ground this would be "*constructed above the existing ground as a raised road. This would have to be removed after the construction period since if retained it would form a low dam across the flood plain.*" [S3AR, 4.7.2.2] The implication of this 'low dam' if the river were to flood during the construction period has not been considered.

C.6 Construction Impacts

It is mentioned that displacement piling could extend over a period of some months and that this activity could disturb local wildlife and potentially inhibit breeding leading to a reduction in population. There is no reassurance that this impact will be avoided, with the statement only that "*construction of the substructure outside the breeding season of sensitive species may need to be considered*" [S3AR, 4.7.2.3].

Significant potential environmental impacts have been identified during the construction phase [ES. App.16, 6.1]. Although control measures will be in place the risk remains unacceptable, especially the risk to water quality from accidental spillage and run-off.

SALISBURY TRANSPORT 2000
Objection to Brunel Link/Harnham Relief Road Planning Application Ref 05/8007

Attachment D: Safety

D.1 Safety

It is acknowledged that the scheme will lead to more rather than fewer accidents, because of the four additional junctions on the road network when the relief road is constructed.

It is concerning that this decrease in safety will in fact be compounded by various additional factors, for example:

- There are a number of instances where footpaths and RUPPS would cross the new relief road, with at-grade crossing which in many cases have no traffic lights. This poses risks to pedestrians, cyclists and horse-riders who wish to cross the road.
- Many of the routes which are bisected by the scheme are currently popular with dog-walkers, and there will be a risk of uncontrolled dogs getting onto the road and causing a traffic accident.
- The climbing lane immediately south of the Netherhampton Roundabout was in the original scheme proposals but removed prior to the planning application in 2002 [S3AR, 3.1.1]. There is a risk that driver frustration behind slow-moving HGVs climbing this hill might lead to risky overtaking manoeuvres being attempted.
- There is a considerable increase in traffic on Churchfields Estate, where parked cars and congestion already cause problems. Risks will increase here for pedestrians and cyclists. The utility value of the footpath/cycleway on the Brunel Link bridge will be considerably decreased by the fact that there are no safe access routes to it from the Churchfields Estate.
- Churchfields Road and Lower Road forms part of the Wiltshire Cycleway, and could potentially become part of Sustrans National Route 24 from Bath to Southampton. This route will get more traffic as a result of this scheme, and the junction with Brunel Road will presumably become much busier (traffic figures have not been supplied). This will increase the risks for cyclists using this route.

SALISBURY TRANSPORT 2000
Objection to Brunel Link/Harnham Relief Road Planning Application Ref 05/8007

Attachment E: Traffic and Economics

E.1 Scheme Cost

The Brunel Link was originally estimated by the Salisbury Transport Study to cost £2.3 million, and, as has been noted already (see B.1.2), the comparison with alternative options to access Churchfields was based on this £2.3 million cost.

The addition of the Harnham Relief Road increased the cost to £13 million, and the Government's provisional acceptance of the scheme in 2000 was for a maximum of this amount. Since then the cost has risen further, to £19 million, and is very likely to rise still more (see E.5 below). It is not likely that additional funds for this controversial scheme would be met from Government funding, since central government expects authorities to "*re-prioritise within your allocation to meet changing demands, including cost increases*" [GOSW-041202]. Given the public's views on transport expenditure (see B.3 above) it seems clear that Wiltshire's taxpayers would not wish to see money re-allocated from public transport, road maintenance, or walking and cycling in order to fund a multi-million pound shortfall on this scheme.

E.2 Traffic Data

E.2.1 Deficiencies in supplied traffic data

The traffic data supplied in Figures 5.1 & 5.2 and in Appendix 3.2 falls well short of the data supplied for the 2002 ES (which was itself deficient in many respects). This scheme is being justified because it is alleged it will reduce the impact of traffic-related problems in Salisbury and yet it is impossible to judge the traffic impacts of the scheme across Salisbury from what has been supplied. Attachment H (Errors and Omissions) gives a list of those links for which traffic flows are required, noting that this list is not exhaustive and that in all cases the flows need to show Do Minimum and Scheme Total Flows, and HGV Flows, on each link.

The traffic modelling provided with the 2002 Planning Application assumed that the Wylve Valley Relief Road would be operational, and Salisbury Transport 2000 were informed by WCC that the traffic modelling was being rerun without this scheme [WCC-030103]. The Wylve Valley Relief Road was finally rejected for government funding in December 2004 and it should therefore not form part of the traffic model. It would have a considerable impact in the model, not least because the A3094/A36 junction would have become a roundabout under that scenario, whereas currently it is light controlled, with no right turns permitted from the A3094 onto the A36. This will affect journey time and distance for HGVs rerouting to access the Brunel Link. Because of the lack of traffic data supplied it is not clear whether the traffic modelling provided with the 2005 Planning Application does or does not assume a Wylve Valley Relief Road.

The traffic model used for the 2002 Planning application assumed that HGVs could use Lower Road Bemerton – where there is an HGV ban which will continue. Salisbury Transport 2000 pointed out in October 2002 that the model showed 204 HGVs using this per day in the 'Do Minimum' scenario, and 637 in the 'With Scheme' scenario [ST2000-021017]. WCC responded that there was an error in the model which would be corrected [WCC-021031]. Equivalent traffic predictions have not been provided with the 2005 Planning Application, and these are required, plus confirmation that the error in the traffic model has been corrected.

E.2.2 Failure to provide COBA assumptions

The assumptions which underlie the COBA calculations need to be made absolutely clear, and they need to match up with the agreed traffic management plan for Salisbury.

As discussed further in E.4 below, various City Centre traffic restrictions, such as the closure of Crane Street and New Street to through traffic were assumed in the Salisbury Transport Study traffic modelling, but these have not occurred and do not form part of the current 'Preferred Option'. The supposed benefits of the Brunel Link/Harnham Relief Road need to be recalculated to take account of current city centre traffic proposals as well as the other points mentioned in E.4 below.

Traffic growth estimates also need to be adjusted to take account of relevant current Local Transport Plan targets, which are as follows [WCC-APR-2004, Appendix 3]

LS1 Target: To reduce the absolute level of traffic entering the city centre by 3.9% in 2005 and 11% in 2011 compared with the 1999 baseline. Baseline 1999: 100, Latest Progress 2003: 98.4. Target on track

LS2 Target: To limit the growth in traffic on the inter-urban approaches to Salisbury to less than 10% between 1999 and 2011. Baseline 1999: 100, Latest Progress 2003: 100. Target on track
 From the traffic figures which have been supplied it would seem that traffic growth far in excess of the LTP targets is being assumed, which will inflate the 'travel time' benefits of the scheme.

E.3 Traffic Growth Assumptions

E.3.1 Traffic levels post-1998

Traffic growth assumptions need to be reviewed in the light of what has actually happened in Salisbury since the Salisbury Transport Study reported, and it is not clear that the latest traffic growth targets and traffic count data have been taken into account. As the Consultation Issues Paper published by WCC reports, Salisbury city centre has benefited from a 6% drop in traffic since 1999. [WCC-CIP-0504]

The Salisbury Transport Study suggested that, without the Salisbury Transport Plan (STP) proposals, traffic levels in 2011 would be 20% higher than 1999 levels. With the proposals it was suggested that this could be reduced by half, to just 10% growth. Since then, this target has been further 'stretched' because traffic levels were found to be falling in Salisbury and hence a revised target has been set, to reduce traffic entering the city centre by 11% in 2011 compared to the 1999 baseline [WCC-APR-2003, Annex 1, App 3, Target LS1].

The 2003 APR was quick to claim both the success of the STP in achieving this reduction, and the necessity of all the elements of the original Strategy to continue this success: "...it must be recognised that the achievement of this (more stretching) target is dependent upon full implementation of the Salisbury Transport Strategy". [WCC-APR-2003, Annex 1, App 9, Target LS1]. However there has been no work done to consider the possible causes of traffic reduction or to consider what factors other than the STP might be causing this. Relevant factors could include modal shift, economic downturn, or external factors such as rerouting of long distance traffic away from the A36 following the opening of the A34 Newbury Bypass in November 1998 (noting that the Salisbury Transport Study traffic surveys, on which the traffic predictions were based, were undertaken before that date).

Salisbury Transport 2000 have pointed out more than once there should be an examination of the factors which have led to traffic reduction in Salisbury, and the cost benefit of the various road proposals should be re-calculated to take account of current traffic levels and new traffic reduction targets [ST2000-031113]. Government Office for the South West have confirmed that they do not understand the causes of the reduction in predicted traffic growth in Salisbury [GOSW-031118]

E.3.2 Traffic levels being assumed

Churchill Way East, which is one of the roads for which traffic predictions have been supplied, has an automatic traffic counter in place, and traffic figures published by Wiltshire County Council for this road in recent years are as follows (24 hour, all vehicle traffic flows, source various Wiltshire Travel Reports):

Year	7 day 24 hour ave daily flow	%Change
1997	32407	
1998	33279	+2.69%
1999	32183	-3.29%
2000	32889	+2.19%

Figures have not been published since 2000, but WCC have indicated that the count in 2003 (provisionally) was 34017. This raises the question as to how a 'do minimum' daily flow in 2008 of 45060 (without scheme) has been arrived at [S3AR, Fig 5.1] This would seem to represent a growth rate of nearly 6.5% per annum for traffic, which far exceeds even the most pessimistic national traffic forecast predictions, and is completely out of line with LTP targets to reduce traffic levels in Salisbury City Centre by 2010 and limit the growth in inter-urban approaches to Salisbury to less than 10% between 1999 and 2011 (see also E.2.2 above). This anomaly casts doubt on the accuracy of the traffic prediction figures being supplied.

E.4 Atkins Re-appraisal of Salisbury Transport Package

In September/October 2003 Atkins reappraised the Salisbury Transport Package to support Wiltshire County Council's submission to the Department for Transport for additional funding for the package.

This re-appraisal did not cover the case for the road scheme which formed part of the package of measures – an omission which Salisbury Transport 2000 have already commented on to Wiltshire County Council in September 2004. [ST2000-040920]

There were however some relevant observations on the road scheme contained in the Atkins reappraisal, notably in the fact that the “Preferred Option” of measures was now calculated to produce a positive net present value (NPV) even without the Brunel Link/Harnham Relief Road. The reasons why this was the case were explained as follows:

- The revised discount rate in the Green Book (3.5% rather than 6%)
- Inclusion of accident benefits associated with the introduction of the 20 mph city centre zone in the calculation of NPV (based on revised advice from the DfT).
- The assumptions about road closures. The Salisbury Transport Study (STS) traffic modelling apparently included “*fairly stringent measures to inhibit through traffic in the city centre, notably a ban on through traffic on Crane Street and New Street. In scenarios that did not include the Harnham Relief Road and Brunel Link this increased the level of traffic around the ring road and caused increases in congestion even when mode shift brought overall reductions in trip levels. The Preferred Option does not include these central measures and therefore the reduction in traffic levels produced by the strategy leads to a reduction in congestion.*”
- The Preferred Option now includes ITS systems, such as Urban Traffic Control (UTC) and a Car Park Guidance System, which improve the operational efficiency of the network.
- The Preferred Option analysis has been based on central traffic growth, whereas the STS scenarios were assessed for a ‘worst case’ high growth scenario.
- The future year trip matrices used in the re-appraisal include different assumptions about the location and scale of future development compared to those used for the STS. It is commented that “*the assumptions in the current matrices are in line with the latest changes in the Local Plan and will have had a noticeable effect on the patterns of movement modelled within the city and therefore on the traffic impact of any strategies modelled*”

Crucially, the Atkins Reappraisal concludes that “**the STP (without road schemes) is now forecast to bring highway time savings rather than highway time losses**”. [Atk-STSR-0310, 3.15]

The road scheme components of the STP should be re-appraised using the same assumptions as the rest of the package, see also E.2.2 above.

E.5 Current Estimated Cost of Scheme

It seems that the cost of this scheme will rise significantly above the current £19.172 million gross cost (S3AR, Table 3.1).

When comparing the costs supplied in this application with those supplied in 2002 it seems very likely that cost increases have been downplayed. Several major items have reduced in cost, which seems surprising in light of the fact that cost indices 3 years later than those used in 2002 are being applied. There is no explanation as to why costs have reduced for any item except contingencies (reduced by an optimistic £850,000 on the rather dubious grounds that there is greater certainty in accessing the preliminaries and structures). Some of the anomalies which are worthy of comment are the following:

- Drainage costs have reduced by nearly £1 million (2002 Drainage £2,121,970; 2005 Drainage and Services Ducts £1,163,500)
- Earthworks have decreased by £830,000 (2002 Earthworks £2,300,382; 2005 Earthworks £1,469,000)

These are substantial decreases, and there needs to be some explanation under ‘Cost Estimate’ [S3AR, 3.2] as to why these have fallen by this amount. (2002 prices taken from [PA-S3A-0209, Table 3.1]).

There is no indication as to whether account has been taken of guidance in the Treasury Green Book. The cost contingency is based on a percentage figure rather than on a quantified risk assessment as is recommended by the Green Book and associated guidance. There are a large number of risks associated with the proposed scheme due to the protected landscape and ecosystems which the road would traverse. Even a cursory glance at the Environmental Statement reveals that there are many uncertainties in what is presented, with each raising the likelihood that costs will escalate.

The following show some examples of instances where it seems there are still matters of some importance, and of some cost implication, to be resolved:

- **Brunel Link**, avoiding environmental impacts: “*This discussion looks at the factors considered when trying to decide on the appropriate construction method in order to minimise the impact on the local environment. No effort has been made to discuss the economic issues which are likely to be looked at more closely during the detailed design stage*”. [S3AR, 4.7.2.1]

- **Traffic calming:** not costed or defined: “Construction of the Brunel Link and Harnham Relief Road will achieve direct benefits for the city centre and the residential neighbourhoods of West Harnham, Bemerton and Fisherton. It will also facilitate and enhance a range of traffic management and calming measures...” [ES 7.49]
- **Flood compensation area,** precise location not yet defined: “The current topographic survey only provides spot levels in a 50m corridor along the route of the highway, which is insufficient to enable a detailed flood compensation proposal to be developed at this stage” [ES 13.12]
- **Lighting:** details not defined: “The roundabout lighting details will be reassessed during the detailed design stage...” [ES 2.26]
- **Costs of specialists,** as described in the Draft Construction Environmental Management Plan: “Other specialists, such as those in landscape architecture, noise, vibration and community relations may be employed as necessary by the Environmental Manager”. [ESV3 App 16, 4.3]
- **Archaeology,** additional work required: “An additional stage of trial trenching may be required to address archaeological issues associated with final design, which may include areas adjacent to the Palaeolithic site and the sites of the proposed flood compensation area, balancing ponds and infiltration basin.” [ES 4.61]
- **Additional land** required for mitigation: “This could be achieved by negotiation or by purchase of the land for future management, perhaps by an external organisation.” [ES 5.240]
- **Bridge Maintenance** uncertainty over access road construction: “It is likely that a track may need to be retained for future use during the maintenance of the bridge ...A lighter construction track would be required to provide access to the bridge for future maintenance. There are proprietary systems that allow grass to grow through the concrete of the track...” [S3AR 4.7.2.2]
- **Piling method** uncertainties over technique & duration: “There are two principal methods of constructing a piled foundation, displacement methods and excavated methods. Each method has advantages and disadvantages which need to be considered in light of the particular conditions at each site...the period of time is likely to be in the range of 50 – 75 working days depending on the exact nature of the ground and the number of piling rigs that are on site..... It is currently proposed to use displacement cast in situ piles...” [S3AR 4.7.2.3]
- **Pile sites** protection: “Depending upon the time of year when construction takes place, there may be a need to board off the more remote pile sites to prevent potential flooding washing excavated material downstream” [S3AR 4.7.2.3]
- **Removal of material** “Although strictly outside the scope of this report, the economics of removing and disposing of the arisings must be considered” [S3AR 4.7.2.3].

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Attachment F: Accessibility

F.1 Impact on Existing Routes

There are discrepancies between the Non-Technical Summary and the detailed Environmental Statement, which disagree as to whether community effects during both construction and operation are slight adverse or moderate adverse (see H.3)

Whatever the DMRB-approved weightings which are assigned to the impact, the reality is that the scheme would have a devastating effect on the tranquil rural countryside to the south of Salisbury, which is currently enjoyed for recreational purposes by many local residents.

F.2 'Benefits' of new cycleway/footway

The Environmental Statement suggests that the three metre wide cycleway/footway on the Brunel Link and Harnham Relief Road "*would be a new route for cyclists and pedestrians that could be used to access public rights of way, the Churchfields Industrial Estate and the hospital. Therefore this would have a beneficial effect of slight/moderate significance.*" [ES 10.98]

However, walking and cycling in the Churchfields estate is already difficult and dangerous, and the problems will be compounded as more traffic is channelled through the Estate by this proposed road (see also Attachment D). Therefore, cyclists and walkers in Salisbury are unlikely to opt to use this route to get to the hospital or to access public rights of way – there are safer and pleasanter routes across to Harnham on the existing Town Path or Broken Bridges route. It is hard to see which residential areas would find it convenient to access the cycleway/footway which is being provided – from Harnham for instance there is currently no footway or cycleway provided along the Netherhampton Road, and there are no plans to provide one as part of this scheme.

Attachment G: Integration
Including compliance with Policy and Plans

G.1 Compliance with Policy & Plans

G.1.1 Overview

It is acknowledged that *“the development would not be wholly in accordance with prevailing planning policies, including the adopted and emerging development plan. However it is considered that the stated need for the proposed development and its associated economic, social and environmental benefits, are material considerations that should give sufficient weight to justify an exception to those policies where conflicts exists.”* [ES, NTS-21]

This statement rather understates the true position, which is that:

- The scheme is contrary to a large number of policies and planning guidance at national and local level. Support for the Brunel Link component of the scheme in the Local Plan has not been reviewed in the light of revised planning guidance on flooding (PPG25) when it clearly should have been. The request that the scheme be added to the Local Plan, and Salisbury District Council’s failure to do so, is covered in B.1.3.
- The need for the scheme has never been demonstrated – there is no attempt to quantify either the scale of the ‘problem’ which the scheme is supposed to solve, or to show the effect of the scheme on city centre traffic movements (see Attachment A)
- The claim that there are economic, social and environmental benefits which arise from the scheme which are ‘material considerations’ that should override those numerous policies where conflicts exist has not been substantiated.

G.1.2 Overarching Policy & Principles

As the Environmental Statement notes, the scheme is contrary to a raft of policies whose aim to promote sustainable development, including PPS1: Delivering Sustainable Development, RPG10, Structure Plan Policy DP1 and Local Plan Policy G1 (ES, paras 15.8 – 15.20).

We do not accept the statement that *“the proposed development would contribute to meeting many of these overarching policy objectives in relation to the economy and conditions in some communities”* [ES 15.23]. In section G.2 below we go through the claims which have been made for the scheme in the ‘Land Use Policy’ Chapter and explain why we do not feel they are justified.

The statement that the scheme *“would also potentially hinder the achievement of those [policy objectives] relating to the environment”* [ES 15.23] is a typical understatement – there is absolutely no doubt that the scheme would have a negative environmental impact overall.

G.1.3 Transport

The ES tries hard to explain how the scheme will comply with PPG13, and its key objectives which, as quoted in section 15.26 of the ES, are to:

- Promote more sustainable transport choices for both people and moving freight
- Promoting accessibility to jobs, shopping, leisure facilities and services by public transport, walking & cycling, and
- Reduce the need to travel, especially by car.

Clearly this scheme is completely at odds with these objectives, although the ES does try to claim that it will meet the objectives “indirectly” [ES 15.31]. Section G.2 below goes through some of the transport claims which have been made for the scheme and explains why these claims lack any substance. If one wanted to achieve the aims of PPG13 for a budget of £20 million there are some rather more direct ways this could be achieved – a walking and cycling network for Salisbury, a railfreight terminal to serve Churchfields, and bus services to serve the industrial estate would be among the more obvious solutions to consider.

G.1.4 Cultural Heritage

It is stated that the policy presumption is that *“features of archaeological or historic interest and their settings should be protected from inappropriate development...there should be a presumption in favour of their physical preservation ‘in situ’.”* [ES 15.82] It is then acknowledged that this will not be possible *“it is likely that remains will be present along the route which cannot, for practical reasons, be preserved in situ.”* [ES 15.87].

G.1.5 Ecology and Nature Conservation

It is “*accepted that there will be some adverse impact on nature conservation interests*”. [ES 15.100] While there is talk in the same paragraph of ‘minimising’ or ‘managing’ this adverse impact this provides little reassurance that the highly protected ecological interests which exist in the route can be adequately protected. Indeed it is admitted in the non-technical summary that “*impacts on the notable species are primarily slight adverse. The exceptions to this would be bats for which impacts are likely to be moderate adverse.*” [ES, NTS-10].

G.1.6 Landscape and Townscape

The Environmental Statement acknowledges without reservations that “*The proposed bypass [sic] would hinder policies that seek to protect open countryside*” [ES 15.107]

There is the comment that the Relief Road would improve accessibility to the Britford Park and Ride site [ES, 15.111], which would assist in limiting car access to Salisbury city centre. However no dependency was established between these two components of the Salisbury Transport Plan. The Salisbury Transport Study Action Plan contained a table of linkages between the measures which make up the transport strategy. Park & Ride is deemed to be dependent on bus priority measures on the park & ride corridors (although it is being implemented at Wilton and Britford without such measures), but there is no dependency identified between Park and Ride and the Brunel Link/Harnham Relief Road. [STS-AP, Table 3.1]

Furthermore, this scheme will hinder Park and Ride objectives by providing a new road access for motorists into Salisbury city centre. This is covered further in G.2.1 below.

G.1.7 Flood Risk and Drainage

Planning Guidance on Development and Flood Risk (PPG25) now states that, in a functional flood plain “*the Government considers that built development should be wholly exceptional and limited to essential transport and utilities infrastructure that has to be there. Such infrastructure should be designed and constructed so as to remain operational even at times of flood, to result in no net loss of flood-plain storage, not to impede water flows and not to increase flood risk elsewhere.*”

The case for this being ‘essential transport infrastructure’ which needs to be located in the flood plain has not been made in this planning application.

While calculations have been provided to ‘prove’ that the impact of the proposed scheme on increased flood levels would be ‘Neutral’ [ES, 13.29] this does not take account of the effect of the embankment and piles in the floodplain on groundwater flows. Groundwater saturation is believed to be one of the flooding mechanisms affecting the village of Netherhampton [ES 13.30].

G.1.8 Conclusions

The Environmental Statement concludes, in respect of Land Use Policy that “*It is accepted that the proposed development would potentially hinder a number of policy objectives that seek to protect resources at all levels. However it is also recognised that other policy objectives in relation to the economy and community are facilitated by the development*” [ES, 15.175]

However the economy/employment case for the scheme has certainly not been made – see also G.2.6 below – and elsewhere in the Environmental Statement it is acknowledged that “*..the scheme would have a **Moderate Adverse** effect on Community by separating residents from facilities and services.*” [ES 10.108] This has been toned down in the Non-Technical Summary, where it is considered that “*Overall, the effects on community facilities are considered to be slight adverse during operation*” [ES NTS-16])

G.2 Claims made for the scheme

Chapter 15 of the ES, Land Use Policy, contains many claims for the benefits of the scheme. There is much repetition in this chapter and the following does not include all the reference to each of these claims.

G.2.1 “by relieving congestion on the surrounding road network, more sustainable modes of travel can be encouraged” [ES, 15.21]

There is nothing in this scheme to directly reduce dependence on the private car, and much could be done to improve walking and cycling facilities across Salisbury for a fraction of the amount being spent on this road scheme. Generally the experience from elsewhere has been that providing more road space will lead to more people taking to their cars, not fewer. The statement that the scheme “*would reduce the amount of traffic on existing routes ... and reduce journey time for public transport making it a more attractive option*” [ES 15.31] is illogical. The scheme does nothing to favour public transport, and

if journey times are reduced on some roads they will be reduced for all motor vehicles, making the car a more attractive option as well as public transport.

By providing more and easier road access options into the city, this road scheme is likely to undermine efforts to encourage motorists to use Park & Ride. Salisbury is a small city to support the five Park and Ride sites which are proposed as part of the Salisbury Transport Package, and it will be more difficult to make these work if new road routes are opened up into Salisbury.

There has never been a scheduled bus service for the large number of workers and customers who wish to access Churchfields Estate. A lunchtime shuttle bus into town was initiated towards the end of 2002, but was discontinued after a year. [SDC-CR-0410, 3.9.4].

Pedestrians and Cyclists are poorly provided for within Churchfields estate, and on the access roads to it. There is a traffic island to assist pedestrians crossing Churchfields Road near the station, but nothing to help those crossing into the estate from Ashfields Road or Cherry Orchard Lane. Parked cars on the estate roads make the whole area fraught for cyclists, and the introduction of through traffic onto the estate roads will only make this situation worse.

There has been a long-term failure to give Churchfields users the choice of access by public transport, walking and cycling, and this scheme does not address this deficiency.

G.2.2 “reduce the volume of traffic on the A3094 Netherhamton Road” [ES 15.34]

The traffic predictions supplied show that the volume of traffic on the Netherhamton Road west of the Harnham Relief Road would increase [S2AR, Fig 5.1], and east of the Harnham Relief Road the reduction would be less than 15% (see G.2.4 below).

G.2.3 “service existing development in an efficient manner” [ES 15.34]

In support of the RPG10 objective “to service existing and new development efficiently in an integrated fashion” [ES 15.32], the point is made that the scheme would be in accordance with this objective as “it would service existing development (i.e. the Churchfields Industrial Estate) in an efficient manner.” [ES 15.34].

However, it has always been stated that the Brunel Link will increase journey time and costs for freight traffic. This time we have been given no Scheme Appraisal section (ref H.1.1), but for the last planning application it was noted that “in relation to vehicle-hours saved and changes to peak hour and off-peak journey time, it is considered that there would be a benefit to car users of the scheme, but a disbenefit to freight and public transport users”. [PA-S3A-0209, 6.4.2]

Furthermore, the impacts of HGVs which are travelling to/from Churchfields to the City Centre need to be considered. According to figures supplied to Salisbury Transport 2000 by WCC 14.5% of HGVs going to/from Churchfields have an origin/destination in the City Centre. [WCC-010725] This would include the Salisbury District Council refuse lorries whose depot is on Churchfields Estate. It is stated in the ES that the Brunel Link scheme would “enable HGVs to be banned from accessing the Churchfield’s Industrial Estate from the north”. [ES 7.47] This means that those HGV accessing the City Centre will need to take a lengthy, time-consuming and costly detour across the Brunel Link, around Harnham Hill, and back into Salisbury via the Harnham Relief Road and Harnham gyratory, or along the A3094 to Park Wall and Wilton, and back along the Wilton Road.

G.2.4 “removing large volumes of traffic from the surrounding road network around Harnham and the City Centre” [ES 15.36]

There is no evidence provided of traffic reduction in the City centre (see also Attachment E and H.1.2). Traffic levels on the main road through Harnham are predicted to reduce by less than 15% which can hardly be considered a ‘large volume’. [S3AR, Fig 5.1],

G.2.5 “will remove HGVs from the City centre” [ES 15.40]

Shops in the City Centre will still require deliveries, and Salisbury Transport 2000’s own traffic count in July 2001 (see A.2.2) suggested that about 30% of HGVs using the Mill Road part of the City Centre route were not going to/from Churchfields but were (presumably) serving other city centre businesses.

WCC’s own traffic predictions supplied with the previous planning application showed that HGVs on Exeter Street, another part of the City Centre route, reduced by only 2.5%, from 734 a day to 716. [RPS-ES-0209]. As we have noted elsewhere, updated traffic predictions have not been supplied for the City Centre with this planning application (see H.1.2).

G.2.6 “will help contribute to meeting employment objectives” [ES 15.55]

The ES makes the claim that improved access to the Churchfields estate may “represent a significant attraction to potential companies wishing to locate to the area. This will help contribute to meeting the local plan’s overall employment objectives”. [ES 15.55]

However the Churchfields Estate is thriving without the scheme. The recent SDC review into Churchfields found that the estate “is home to 165 companies employing around 4,500 people and together they have a combined annual turnover of £600 million”. Furthermore, the report stated that “The location of the estate is popular with businesses and demand for space is high. Vacancy levels are low.” [SDC-CR-0410, Executive Summary].

G.2.7 “would reduce traffic levels though Harnham by up to 80%” [ES 15.62]

The traffic predictions supplied with this planning application do not show a reduction of anything like 80% on any of the roads into Harnham. For the last planning application a drop of this sort of level was only recorded on the Old Blandford Road (figures not provided this time), which had a trivial level of traffic in any case. The traffic levels along the A3094 through the main part of Harnham is predicted to have a traffic reduction of less than 15% (see G.2.4 above).

G.2.8 “to support sustainable economic growth in appropriate locations” [ES 15.63]

The statutory environmental bodies have expressed strongly, and consistently, the view that the long term sustainable future of Churchfields needs to be considered, and that this road scheme does not provide an appropriate solution (see B.5).

G.3 Inclusion in WCC Structure Plan

The undemocratic manner in which Wiltshire County Council has attempted to add this road scheme into the Structure Plan without discussion or debate, on the basis of a planning application which WCC alleged was “at an advanced stage” but which was subsequently withdrawn, is particularly worthy of comment.

In October 2002 the scheme was deemed to be in neither Local nor Structure plan and was advertised as a ‘departure’ application from the Development plan.

In 2003/04 the County went through a process to update the Wiltshire Structure Plan, putting alterations on formal deposit and consulting on changes between 27/10/2003 and 8/12/2003. Alteration No. 9 Strategic Network Improvements sought to add the Harnham Relief Road & Brunel Link to the Structure Plan, and it was noted that “*Objections to the Harnham Relief Road and Brunel Link have been received from 6% of respondents to Alteration 9. Many of the objections are concerned with the possibility of ecological damage to the river and water meadows, and whether the road could lead to an increased risk of flooding. English Nature considers that the development of these roads could damage the River Avon System SSSI and cSAC.*” [WCC-040227-17, Appendix 1, para 43]

Despite these objections the scheme was left in Alteration No. 9, and it was decided not to examine the proposal in public at the Examination in Public into the Structure Plan changes since “*The need for the Brunel Link and Harnham Relief Road was identified through the GOSW Salisbury Transport Study and funding provisionally accepted through the Local Transport Plan bid in July 2000 subject to planning permission and relevant highway orders being secured. A planning application was submitted in September 2002 and is at an advanced stage. Further examination of the proposal is not considered appropriate at the EIP.*” [WCC-040227-17, Appendix 1, para 51]

Salisbury Transport 2000 wrote to the Strategic Plan Manager on 18/5/2004 making the following points [ST2000-040518] :

- Provisional funding was for only £13 million, and costs had risen to at least £18 million
- The planning application did not appear to be “at an advanced stage”
- The scheme may have been recommended by the Salisbury Transport Study but this did not mean it was exempt from PPG12 guidance and the scheme should have been added to the Local Plan.
- The Salisbury Transport Study consultation was flawed – there was strong support for alternatives to a Brunel Link, and the Assessment Reports were not made available until a year after the Study concluded.
- The Brunel Link component of the scheme had not been reviewed in the light of the revised PPG25 and it should have been.

The response from the Strategic Plan Manager included the points that *“the planning application is considered to be at an advanced stage due to it having passed through the statutory publicity, notification and consultation stage ... the application has not yet progressed to the final determination stage because there is a need for additional information”* [WCC-040802]. A subsequent letter explained further *“..the absence of a scheme in the development plan does not prohibit a planning application being made for that scheme. The planning application process provides the opportunity for your wider concerns to be raised and considered. The planning application will be determined in accordance with the development plan unless material considerations indicate otherwise. The Salisbury Transport Study will be one of the many material considerations, not the only one.”* [WCC-040820]

The planning application which had been used to justify the inclusion of the scheme in the Structure Plan was then subsequently withdrawn [WCC-050131]. The reason for this withdrawal was not explained in the letter sent out, though the subsequent planning application explains *“In consideration of the archaeological findings, of the work involved in conducting further investigations and assessments relating to these and other comments, on the advice of the County Council’s Planning Officer, it was decided to withdraw the original Planning Application and submit a revised application for Planning Permission.”* [S3AR para 1.2]

Whatever the factors which led to the withdrawal of the original planning application it is obvious that many of them were known by the end of 2003 – Development Control had written a memo highlighting numerous failings of that application in February 2003 [WCC-030217]. It was misleading therefore to state that the planning application “was at an advanced stage” in Feb 2004 [WCC-040227-17] and in August 2004 [WCC-040802], and the scheme should not have been added to the Structure Plan using this justification.

G.4 “Material Considerations”

The scheme promoters claim that there are “material considerations” which outweigh the planning presumption which would rule against this application, since it is not in the Development Plan. These considerations are:[ES, NTS-21]

- **“stated need”**

But the need has not been clearly stated – see comments in Attachment A

- **“associated economic, social and environmental benefits”**

Chapter 12 of the Environmental Statement repeats various claims for the benefits of the scheme – see G.2 above. But we would contend, as we have argued in G.2 above, that there are no real benefits demonstrated here and most certainly none which would outweigh the damage which this scheme would cause.

Attachment H: Errors, Inconsistencies and Omissions in the Planning Application

The documentation supplied with the planning application is incomplete and does not appear to have been checked. Information which has been promised by the scheme developer as a result of comments on the previous planning application (02/1961) has not been supplied.

H.1 Missing Information

H.1.1 Appraisal Summary Table and GOMMMS Worksheets

According to the ES para 1.18, the ES has been prepared in accordance with the DETR's "Applying the Multi-Modal New Approach to Appraisal to Highway Schemes" document. There should therefore be an Appraisal Summary Table (AST) and GOMMMS Worksheets supplied. For the 2002 ES these were supplied in Section 6 & Appendix A of the Stage 3 Report, but they have not been supplied in the latest Stage 3 report.

H.1.2 Traffic Data

The traffic data supplied in Figures 5.1 & 5.2 and in Appendix 3.2 falls well short of the data supplied for the 2002 ES (which was itself deficient in many respects).

This scheme is being justified because it is alleged it will reduce the impact of traffic-related problems in Salisbury and yet it is impossible to judge the traffic impacts of the scheme across Salisbury from what has been supplied. The following is required in addition (this list is not exhaustive). In all cases the flows need to show Do Minimum and Scheme Total Flows, and HGV Flows, on each link:

(a) Links where traffic data was supplied with the 2002 Planning application, not supplied this time.

A320 Devizes Road (north of The Avenue)

A320 Devizes Road (south of The Avenue)

A354 Castle Road

Churchill Way West (St Pauls roundabout to Castle roundabout)

Churchill Way North (Castle roundabout to St Marks roundabout)

Churchill Way East (St Marks roundabout to Rampart Rd)

A36 Wilton Road (A30 to Park Wall)

A36 Wilton Road (Park Wall to Cherry Orchard Lane)

A36 Wilton Road (Cherry Orchard Lane to Ashfield Road)

A36 Wilton Road (Ashfield Road to St Pauls roundabout)

Ashfield Road

Cherry Orchard Lane

Lower Road (west of Cherry Orchard Lane)

A WCC letter of 29/11/2002 indicated that, for the above 3 roads, which are access routes into Churchfields, Atkins Transport Planning would be asked to provide information about the proportion of flows on each road which is coming from/going to the Churchfields Estate itself. [WCC-021129]

Churchfields Road (between Cherry Orchard Lane & Ashfield Road)

Exeter Street

St Nicholas Road/Harnham Road

WCC letter of 29/11/2002 gave separate figures for Harnham Road/St Nicholas Road, rather than combining them with New Bridge Road as was done in the 10/2002 ES [WCC-021129]. Separate figures are also required this time around.

Coombe Road (east of HRR to Old Blandford Rd)

Old Blandford Road

A3094 Netherhampton Road (A36 Park Wall to Lower Rd Quidhampton)

A3094 Netherhampton Road (Lower Rd Quidhampton to Race Plain junction)

New Harnham Rd (between Old Blandford Rd & Harnham Rd junctions)

(b) Links where information was not supplied last time, but WCC had agreed to supply it

New Street

Mill Road

Fisherton Street (north of Fisherton bridge mini-roundabout)

Fisherton Street (south of Fisherton bridge mini-roundabout)

South Western Road

WCC letter of 29/11/2002 indicated that flows within the City centre, including HGV movement, would be obtained, as "it would be helpful to have more detail on these flows". [WCC-021129]

H.1.3 Archaeological Mitigation Strategy

An 'Archaeological Mitigation Strategy (RPS, 2005)' is referred to in the Draft CEMP [ES, App 16.1, App C, SEP Cultural Heritage] but has not been included.

H.2 Substantive errors in the ES

There are numerous sentences in the ES with substantive errors, such that the meaning is not clear, or something is clearly missing, as the following examples show:

Volume	Section	Error
ES.V1	throughout	References are incomplete – in some cases a list of references is provided after a chapter (e.g. Chpt 3, 4) & in some cases it is not (e.g. Chpt 2, 7), despite the fact there are references in these chapters.
ES.V1	1.23	Reference to missing sections <i>"The impacts are summarised in the tabular format provided by TAG and are included within Part 2 of the SAR for the scheme"</i> As noted in H.1 above, the Appraisal Summary Table referred to is missing, as are the GOMMMS worksheets.
ES.V1	5.211	Incomprehensible sentence: <i>"However, habitat loss will occur a period of require to be during construction a small section of ditch will be permanently lost under the embankment of the Brunel Link."</i>
ES.V1	5.279	Incomprehensible sentence: <i>"The significance of effects on broad-leaved woodland would be moderate adverse as it the sites integrity would not be adversely affected, but the proposals may have some impacts on the."</i>
ES.V1	9.89	Incomplete sentence: <i>"Calculations of noise change have been undertaken based on the supplied 18-hour, two-way traffic flows, percentage of HGVs and speeds. They do not take account of the effect of existing noise barriers such as"</i>
S3AR	Figure 1.1	Road scheme has been misplaced on the 'Location in County Road Network' diagram – the scheme is shown as connecting to the A36 both to the west and east of Salisbury City Centre

H.3 Inconsistencies in the ES

There are numerous places where there are inconsistencies between different parts of the document:

Topic	Volume	Section	Statement
Tree clearance on River Nadder south bank	ES.V1	5.257	<i>"The [bat] commuting route in this area would be retained ... through the retention and enhancement of the existing understorey up to the bridge structure.."</i>
	S3AR	4.7.2.2	<i>"..access for equipment and plant may have a significant impact on the site...A temporary causeway alongside the bridge will need to be laid down .. it is likely that a track may need to be retained for future use during the maintenance of the bridge".</i>
Value of the balancing pond as wildlife habitat	ES.V1	6.138	<i>"The proposed balancing pond will be designed as a natural landscape feature and wildlife habitat."</i>
	ES.V3	App 16.1, App C, SEP Ecology & Conservation	<i>"..there are also two balancing ponds .. included within the scheme as pollution control measures. The value of these habitats may be adversely affected by pollution..."</i>
Construction effects: Community Facilities	ES.V1	10.74	<i>"..the impact of the scheme during the construction period is considered to be Slight Adverse."</i>
	ES-NTS	NTS-16	<i>"Community effects ...During construction ...overall these effects are considered to be moderate adverse."</i>

Operational effects: Community Severance	ES.V1	10.108	"Overall ...the scheme would have a Moderate Adverse effect on Community..."
	ES-NTS	NTS-16	"Community effects ...Overall, the effects on community facilities are considered to be slight adverse during operation."

H.4 Minor errors in the ES

There are numerous instances where typographical and cross-referencing errors have not been picked up. The document does not appear to have been proof-read:

Volume	Section	Error
ES.V1	1.11	Incorrect reference (should be 1.15): "Following consultation (see paragraph 1.14), it was concluded that the ES ..."
ES.V!	5.20	It is stated, in respect of the Barn Own & Badger report that "Details about how to obtain a copy of these reports are given in the References section", but these details are not supplied. Also mentioned in 5.175.
ES.V1	5.40	Missing word before 'supports'? "The area in the north west of the survey area adjacent to the supports grassland."
ES.V1	5.51	Paragraph seems to be in wrong subsection under Quarry rather than Running Water "Overall the riverine habitats in the vicinity of the crossing point provide an important ecological resource for a range of wildlife."
ES.V1	5.299	Missing word ?accident: "There is also a small risk of otters being involved in a traffic if dispersing overland between foraging areas."
ES.V1	7.41	Reference to Mill Lane should be Mill Road "...and part of Mill Road or via New Street, Crane Street and Mill Lane."
ES.V1	15.40	Unclear what road is being referred to: "...in the case of the Brunel Link will remove HGVs from the city centre, which will improve the environment. By cutting congestion public transport along this road may become more reliable and therefore more attractive to local people" If "this road" is referring to the City Centre HGV route via New Street & Mill Road there are not any public transport routes which use this road.
ES.V3	App 16.1, 3.3	Draft CEMP – incorrect cross-reference "The description of the main construction works is included in Chapter 14 of the Environmental Statement..." Chapter 14 is 'Geology and Soils' and does not include the description specified.
S3AR	2.1.1	Incorrect word – "I" should be "in"? "Figures 1.1 and 1.2 illustrate the County Road Network overall and I relation to the south of Salisbury respectively"
S3AR	2.2	Reference to Mill Lane should be Mill Road "...through the city centre via New Street, Crane Street and Mill Lane."
S3AR	3.2	Incorrect year – should be 2005? "The updated cost estimate for the scheme has been prepared in March 2004" The date seems more likely to be March 2005, as Table 3.1 indicates 'Cost Estimate (2005)', and para 3.2 says RCTPI figures used were for Q3 2004.

SALISBURY TRANSPORT 2000
Objection to Brunel Link/Harnham Relief Road Planning Application Ref 05/8007

Attachment I: References

The following documents and correspondence are referred to in this objection.

The current Environmental Statement (dated March 2005) and Stage 3 Assessment Report are referred to as ES and S3AR respectively.

Reference	Report/Correspondence
Atk-STRA-0310	Atkins, Salisbury Transport Package Reappraisal, October 2003
EA-030113	Letter from Craig Fisher, Environment Agency to Mr T L Jones, Highways Improvement Manager WCC 13/1/2003
GOSW-031118	Letter from Peter Dawson, Head of Regional Transport GOSW to Salisbury Transport 2000 18/11/2003
GOSW-041202	Letter from James Llewellyn, Regional Transport Team, GOSW to Dr Keith Robinson, Chief Executive, WCC ref SW/THM/4062/14, 2/12/2004
PA-S3A-0209	Parkman, Harnham Relief Road and Brunel Link Stage 3 Scheme Assessment Report Part 2, report ref: 0040914/R/1 (issued in support of planning application S.02.1961), Sept 2002
RPS-ES-0209	RPS, Harnham Relief Road and Brunel Link Environmental Statement (issued in support of planning application S.02.1961), Sept 2002
SDC-Cab-050511	Salisbury District Council, Report to Cabinet, 11/5/2005, Agenda item 9
SDC-CR-0410	Salisbury District Council, A Review of the Churchfields Industrial Estate, October 2004
SDC-LP	Salisbury District Council – Local Plan
ST2000-021017	Letter from Salisbury Transport 2000 to Tim Jones, Highways Improvement Manager WCC, 17/10/2002
ST2000-021127	Salisbury Transport 2000, Objection to Brunel Link/Harnham Relief Road Proposals (planning application reference S.02.1961), 27/11/2002
ST2000-030925	Letter from Salisbury Transport 2000 to Peter Dawson, Head of Regional Transport GOSW, 25/09/2003
ST2000-031113	Letter from Salisbury Transport 2000 to Peter Dawson, Head of Regional Transport GOSW, 13/11/2003
ST2000-040518	Letter from Salisbury Transport 2000 to David Rapley, WCC Strategic Plan Manager, dated 18/5/2004
ST2000-040920	Letter from Salisbury Transport 2000 to Allan Creedy, LTP Manager, dated 20/09/2004
ST2000-050404	Letter from Salisbury Transport 2000 to Cllr Jane Scott, leader of WCC, dated 4/04/2005
STS-AP	Salisbury Transport Study – Action Plan, August 2000
STS-ARV1	Salisbury Transport Study – Assessment Report Volume 1, April 2001
STS-ARV2	Salisbury Transport Study – Assessment Report Volume 2 Annexes, April 2001
STS-CR	Salisbury Transport Study – Consultation Report, April 2000
STS-L99	Salisbury Transport Study – Exhibition Leaflet, Autumn 1999
STS-PS	Salisbury Transport Study – Summary of the Preferred Strategy, August 2000
WCC-APR-2002	Wiltshire Local Transport Plan 2002 Annual Progress Report

WCC-APR-2003	Wiltshire Local Transport Plan 2003 Annual Progress Report
WCC-APR-2004	Wiltshire Local Transport Plan 2004 Annual Progress Report
WCC-CIP-0504	Wiltshire County Council, Provisional Wiltshire Local Transport Plan 2006/07 – 2010/11, Consultation Issues Paper – April 2005
WCC-LTP1	Wiltshire Local Transport Plan 2001/02 –2005/06
WCC-010725	Letter from T L Jones, Highways Improvement Manager WCC to Salisbury Transport 2000, ref TLJ/MGS/8968, dated 25 July 2001
WCC-021015	Letter from Richard Lander, Director of Environmental Services to Salisbury Transport 2000, ref TP/LTP/CDD, dated 15/10/2002
WCC-021031	Letter from T L Jones, Highways Network Manager, WCC, dated 31/10/2002, ref PB/CDD/8968
WCC-021129	Letter from T L Jones, Highways Network Manager, WCC, dated 29/11/2002, ref PB/CDD/8968
WCC-0301	Letter from T L Jones, Highways Improvement Manager WCC to Environment Agency, dated January 2003
WCC-030103	Letter from T L Jones, Highways Network Manager WCC to Salisbury Transport 2000, dated 3/1/2003, ref PB/LMG/8968
WCC-030217	Memo from Jason Day, Minerals Waste & Development Control WCC to Peter Binley, Highway Improvement Section WCC, dated 17/02/2003
WCC-040227-17	Wiltshire County Council Cabinet 27/02/2004, Agenda Item 17
WCC-040802	Letter from David Rapley, Strategic Plan Manager to Margaret Willmot, dated 02/08/2004
WCC-040820	Letter from David Rapley, Strategic Plan Manager to Margaret Willmot, dated 20/08/2004
WCC-050131	Letter from Jason Day, Principal Planning Officer WCC to Salisbury Friends of the Earth dated 31/01/2005.
WCC-050316	Letter from Cllr Jane Scott, Leader of WCC to Salisbury Transport 2000, dated 16/03/2005
WCC-050427	Letter from Cllr Jane Scott, Leader of WCC to Salisbury Transport 2000, dated 27/04/2005
WCC-050428	Letter from Alan Feist, Assistant Director of Planning and Development to Salisbury Transport 2000, dated 28/04/2005
WCC-050524	Email from Gerry Chequer, Group Manager – Local Plans and Development Control, WCC to Margaret Willmot, 24/05/2005
WSWLP-RDD	Wiltshire & Swindon Waste Local Plan 2011 Revised Deposit Draft, September 2002
WSWLP-IR	Wiltshire & Swindon Waste Local Plan 2011 – Inspectors Report

SALISBURY TRANSPORT 2000
Objection to Brunel Link/Harnham Relief Road Planning Application Ref 05/8007

Attachment J

Salisbury Transport 2000's Report
Salisbury: The Way To Go, A Green Transport Plan for the 21st Century

A hard copy of this report is supplied for the original of this objection being filed with Development Control at County Hall Trowbridge only.

For other copies of this objection, please note that this report can be downloaded from Salisbury Transport 2000's website at www.salisburyt2000.org.uk.

Particularly relevant to this objection is Chapter 6 of the report, "Churchfields: A New Vision".