

Planning Application LPA Ref: PL/2021/09778

Land at Station Works, Station Road, Tisbury, Wiltshire SP3 6QU



Appeal Reference: APP/Y3940/W/22/3308919



Statement of Case

Appendix A – Access Scheme

Prepared for Tisbury Parish Council

Final version – 15th December, 2022

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1. Introduction

This document provides additional evidence relating to the proposed **access scheme** to support the Statement of Case submitted by Tisbury Parish Council.

Background

- A 1.1. The development proposal is based on an access scheme set out in the Planning Statement (prepared by Intelligent Land, dated August 2021) and a Transport Assessment (prepared by Campbell Reith Hill LLP, dated September 2021).
- A 1.2. The proposal was submitted for planning consultation commencing 26th October, 2021 with a deadline of 30th November, 2021. Of the 260 representations from local people, community organisations, parish councils and non-statutory consultees to the planning consultation in October/November 2021, 217 (83%) raised objections on grounds of the access arrangements, putting forward a number of practical issues and questions relating to the access scheme.
- A 1.3. Tisbury Parish Council understands that the access scheme remains unchanged from that presented in November 2021 and this paper therefore considers the Planning Statement and Transport Assessment which currently appear on Wiltshire Council's website.
- A 1.4. Wiltshire Council's definitive assessment of the access scheme is set out in the following documents:
 - The Highways Officer's Report dated 22nd July 2022
 - The Planning Officer's Report to the Southern Area Planning Committee meeting held on 10th November, 2022
 - The Minutes of the Southern Area Planning Committee meeting which contain the 'deemed' reasons for refusal.

Purpose of this document

- A 1.5. This document is intended to supplement Wiltshire Council's assessment. Tisbury Parish Council agrees with Wiltshire Council's conclusions and the purpose of this document is not to repeat them.
- A 1.6. However, having assessed the public representations, the Parish Council considers that they raise additional questions regarding the access scheme which have not been addressed in the development proposal or in the Case Officer's report.
- A 1.7. The Parish Council considers these questions cast doubt on the proposed access scheme and they are dealt with in turn below.

2. The Policy Context

National Planning Policy

- A 2.1. Paragraph 93 seeks that development should ensure integration of housing, economic uses and community facilities:

To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: ...ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.
- A 2.2. Paragraph 104 emphasises that transport issues should be planned from the earliest point:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

- A 2.3. Paragraph 105 emphasises the role of transport planning in ensuring that developments are sustainable:

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

- A 2.4. Paragraph 110 seeks to ensure the choice of sites and their designs promotes sustainable transport, offers safe and convenient access for all users and considers the impact on the surrounding highway network:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree”*

- A 2.5. Paragraph 111 seeks to define the criteria for refusal of a development on account of its impact on the surrounding highway network:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

- A 2.6. Paragraph 112 states that developments should be planned for a hierarchy of users, but should address the needs of all users:

Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

A 2.7. Paragraph 112 states that developments should create places:

“that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

The Neighbourhood Plan

A 2.8. A summary table showing the Neighbourhood Plan relevant to the access scheme is set out in Appendix J.

3. The Site Allocation

The Neighbourhood Plan

- A 3.1. The allocation of the proposal site by the Neighbourhood Plan was informed by the recognition that provision of a direct pedestrian and cycle access route to and from Tisbury village would be essential to unlock the site and achieve its sustainable development.
- A 3.2. The site allocation policies of the Neighbourhood Plan were developed on the basis of the Tisbury and West Tisbury Neighbourhood Plan Site Assessment, developed by Aecom, which stated that *“a more direct pedestrian access would need to be provided over the railway line into Tisbury The site is appropriate for allocation in the Neighbourhood Plan with a number of key conditions: safe vehicle and pedestrian access is put in place across the railway line to provide direct access into Tisbury village centre.”*¹
- A 3.3. The Parish Council considers:
- that the Neighbourhood Plan justifiably encouraged this need to be met through provision of direct access from the site to Tisbury village;
 - that it recognised the dual benefits of a direct access route in achieving [a] Network Rail’s objectives to enhance the railway line at Tisbury (including dual operation of the track and reconstruction of the “down” platform) and [b] the Neighbourhood Plan’s objective to unlock an important brownfield site for sustainable use;

¹ Tisbury & West Tisbury Neighbourhood Plan Site Assessment, July 2017, Paragraph 4.1.3 and Table ES1 (A1) with Appendix [A] Site 1, Table 4.1 (A2)

- that it recognised the need for positive engagement over a sustained period on the part of the landowner and other stakeholders, including Network Rail and the Parish Council itself, to achieve these objectives; and
 - that the Plan was positively prepared and that great care was taken by its Steering Group to ensure that it balanced considerations of viability, the need for sustainable development and the wishes of Tisbury's community.
- A 3.4. Appendix J sets out the various references to the proposed access route set out in the Neighbourhood Plan.
- A 3.5. The Parish Council considers that the provisions of the Neighbourhood Plan, taken as a whole, are clear that provision of a new pedestrian access route is regarded as integral to a wider scheme involving both development and rail enhancement at the site.
- A 3.6. In the Parish Council's judgement, the objectives set in the Neighbourhood Plan take appropriate account of:
- access needs to support the sustainable use of the Station Works site for housing;
 - viability;
 - the fragility of the surrounding road network; and
 - the interdependency between development and Network Rail's plans to upgrade and extend the rail line and station.
- A 3.7. The Parish Council consider that the Neighbourhood Plan continues to represent the community's vision for the access route. Of 351 people who responded to the Neighbourhood Plan renewal survey in May 2022:
- 95% supported renewal of the Neighbourhood Plan in 2022 and 93% supported its current Vision Statement; and
 - 76% indicated they would not be willing to consider removing the requirement for direct access to the Station Works site².
- A 3.8. The Neighbourhood Plan envisaged that the access scheme for the site, along with provision of a new railway crossing, the expansion of Tisbury rail station, provision of additional railway parking to encourage greater use of sustainable transport, and resolution of other site-specific challenges should be achieved through the creation of a comprehensive masterplan, developed through collaboration between the community and key stakeholders. Given the site's specific challenges and history the Plan anticipated that masterplanning was the only way to ensure that all the moving parts necessary to ensure a sustainable future for the site could be brought together into a coherent whole.
- A 3.9. The Parish Council notes that the need for an integrated approach was agreed by Wiltshire Council, Network Rail, the parish councils and by the current landowner. It was endorsed by the Examiner of the Neighbourhood Plan, who noted in his report that in the view of Wiltshire Council *"a partnership between railway, local authority and other bodies is required", a view endorsed by the owners of the Station Works site. It would seem that Policy TR.2, and the Qualifying Body endorses this view, should seek to ensure a working partnership between the interested parties rather than be prescriptive about the nature of improvements, the viability of which has yet to be assessed."*

² Tisbury & West Tisbury Neighbourhood Development Plan Renewal 2022 – Stage 1 Community Engagement Report, Section 8 (page 41) (A3)

The Proposed Access Scheme

- A 3.10. The Parish Council considers that the access scheme included in the development proposal has been promoted as an alternative, self-standing solution in preference to the integrated access arrangement, connecting the site directly to Tisbury village, which is envisaged by the Neighbourhood Plan.
- A 3.11. The Parish Council was first informed about the detail of the access scheme on 6th April 2021³, some two years after the appellant states that design work had commenced⁴, and just over a month after Wiltshire Council had issued its final pre-application advice on the proposal scheme⁵.
- A 3.12. The proposed solution follows the basic approach proposed in a scheme which formed part of a previous planning application in 2003. The previous proposal involved using a route from the site leading initially towards the South-west, away from Tisbury village and passing under the Three Arch Bridge, then making its way along either Station Road or preferably (because Station Road does not have pavements for most of its length) along the Stubbles footpath, Hinton Hall Car Park and Church Street to Tisbury's High Street.
- A 3.13. This scheme was rejected by Wiltshire Council in 2003 on the grounds that it *"will lead to wheelchair users wishing to access the railway station and the main part of Tisbury village (and vice versa) having to travel via a circuitous route along a section of Class III road where there are no footways and where visibility is restricted to the detriment of highway safety"*⁶.
- A 3.14. The current scheme differs from the 2003 scheme in two significant respects:
- it is intended for use by all pedestrians and cyclists travelling to and from the proposal site (whereas the 2003 scheme was intended for wheelchair users and cyclists only, with pedestrians using a footbridge over the railway)
 - it involves closure of the Southbound arch of the Three Arch Bridge to motor vehicles and the introduction of signalised one-way working at the bridge, with the construction of a mesh walkway through the Southbound arch for the use of for pedestrians and cyclists.
- A 3.15. On leaving the Three Arch Bridge towards Tisbury village, the route would be the same as that proposed in 2003.

Risk Assessment

- A 3.16. In the Parish Council's view the promotion of such a stand-alone scheme involves significant risks, which any proposal must address:
- closure of one carriageway at the Three Arch Bridge to vehicle traffic will prove difficult to reverse once the development has been built because the proposed development will depend upon it. There is no 'fall-back' position;
 - the Three Arch Bridge itself is Tisbury's only road suitable for commercial vehicles travelling South, to the A30 road and the villages between. The surrounding network of country lanes, many of them narrow or single track, is limited, meaning that an issue at

³ Statement of Community Involvement, paragraph 6.8 (S10)

⁴ Statement of Community Involvement, paragraph 3.2 (S10)

⁵ Wiltshire Council letter to Intelligent Land, reference 20/11563/PREAPP dated 11th March 2021 (S11)

⁶ Officer Report, Planning Application S2003/2547, Refusal Ground 4.(A4)

the Three Arch Bridge could have a significant impact for Tisbury and the surrounding area. Again, there is no realistic 'fall-back' route;

- channelling of all traffic through a single arch inevitably introduces a single point of failure where one does not currently exist; and
- under the access scheme, all vehicle, pedestrian and cycle access from the proposal site to and from Tisbury will take place through the Three Arch Bridge, again introducing a single point of failure.

A 3.17. The Parish Council's view is that the available evidence should give both planning and highway authorities a very high level of confidence that the scheme will work as intended for the foreseeable future before consent is granted.

A 3.18. The level of confidence in the Transport Assessment is therefore an important matter to consider.

A 3.19. The Parish Council considers that confidence in the proposal will depend among other things, on the following six matters:

- the accuracy of the traffic modelling on which the scheme is based;
- judgements made about the safety of pedestrians, cyclists and motorists;
- judgements made about the length and difficulty of the proposed pedestrian and cycle route and the extent to which these will exclude the site from the remainder of Tisbury village and hinder objectives to promote active modes of travel;
- the likelihood of flooding affecting the access route and its impact on residents of the development, and in particular the residents of the proposed care home;
- the impact of the scheme on the surrounding lanes;
- the degree to which the access scheme will reduce the resilience of the local road network and increase its vulnerability to disruption at the Three Arch Bridge.

Parish Council's Case

A 3.20. On the basis of the evidence presented in the Transport Assessment, and taking into account the matters raised by Wiltshire Council and by members of the public, the Parish Council considers that that significant questions remain over the access scheme on all six matters referred to above.

A 3.21. The Parish Council considers that these questions go to the heart of the proposed scheme and it is unlikely that they can be addressed by condition because the site design and the access scheme are inextricably linked. They should in the Parish Council's view be resolved and the development proposal re-presented with a fundamentally different access scheme, or one which has been significantly enhanced to overcome the issues raised.

A 3.22. At the end of the document, some strategies are put forward which the Parish Council believes would overcome these problems were they to be positively progressed.

A 3.23. The Council will seek to agree these to the maximum extent possible with the appellant and with Wiltshire Council.

A 3.24. However, based on the documents currently put forward, the assessment of the Parish Council is that there is a material risk that the access scheme as currently set out will act to the detriment of highway safety, weaken the resilience of the local road transport network to an unacceptable degree and compromise the well-being of residents of the proposed development.

- A 3.25. The Parish Council's view is that these defects cannot be considered in isolation, but arise because the development proposal has not been brought forward through a masterplanning process capable of addressing the various challenges represented by the proposal site in a coherent way, recognising their interdependencies and the perspectives of the stakeholders involved.

Scope of this document

- A 3.26. This document will deal with the question of the length and difficulty of the proposed pedestrian and cycle route only to the extent that it has not already been dealt with by Wiltshire Council.
- A 3.27. The other five matters referred to in paragraph A 3.19 will be dealt with in full.

4. Traffic Modelling

- A 4.1. In the planning consultation in October/November 2021 members of the public raised a number of questions about the reliability of the data used to inform the traffic model on which the access scheme is based.
- A 4.2. There are five points where the model is not, in the view of the Parish Council, sufficiently robust to justify approval of the scheme or support the conclusion that it can operate without significant queue lengths at the Three Arch Bridge:
- the database projections for the dwellings used to inform the model
 - the projections for the care home;
 - allowance for site-specific factors;
 - allowance for the effect of the railway, including planned enhancements at Tisbury station, provision of additional parking and improvements to service levels resulting from the proposed upgrade to the West of England line (as required by the Neighbourhood Plan);
 - differences between the consultant's stated traffic volumes and those actually used as the input to their traffic model.

The Projection for Houses and Flats

- A 4.3. The traffic model set out in the Transport Assessment uses as its input the following forecast of additional traffic volumes generated by the 74 houses proposed for the Station Works site⁷:

Trip Generation for all Units (Vehicles)	Generation Arrivals	Trip Generation Departures	Trip Generation Total
AM Peak Period (08:00-09:00)	12.556	28.62	41.176
PM Peak Period (17:00-18:00)	25.336	15.24	40.576
Daily Trip Rate	203.074	210.156	413.23

⁷ Transport Assessment, table 6.7, page 22.

- A 4.4. In the absence of real data from a relevant local site, the model relies on a projection created from a database developed by TRICS Consortium Ltd., using data blended from 56 sample sites across England and Wales.
- A 4.5. The sample sites chosen are dominated by edge of town or suburban neighbourhood centres, which are well served by public transport. **42** of the 56 locations have populations of between 5,000 to 50,000 living within a 1 mile radius, whereas the population of Tisbury village at the 2011 census was **2,178**.⁸
- A 4.6. The Parish Council commissioned an assessment of these 56 sites which is reproduced at Appendix A. The assessment found that the average number of buses serving these locations on a typical weekday between 6am and 9am is **6.86** in one direction, whereas the equivalent figure for Tisbury is **zero**.⁹
- A 4.7. The Parish Council considers that these reference sites cannot be used with confidence to predict vehicle journeys for Tisbury because their location within or at the edge of densely populated areas which are well served by public transport will inevitably result in substantially lower forecasts for vehicle use. It considers that the presence of Tisbury railway station is not relevant for this purpose as its impact on modal share within Tisbury is minimal. In 2011 the percentage of commuters in the Neighbourhood Plan area using a car or van to travel to work was slightly higher than that in Wiltshire as a whole (70.1% compared with 69.9%) despite the presence of the railway station.¹⁰
- A 4.8. The 21 reference sites used to forecast the additional traffic volumes generated by the 12 flats appear to have the same profile as the 56 used for houses.
- A 4.9. Guidance from TRICS Consortium is that the choice of reference sites is essential for an accurate projection to be generated. They state that in site selection *“the importance of compatibility in terms of local population, vehicle ownership, location type, etc. cannot be stressed enough.”*¹¹

The Projection for the proposed Care Home

- A 4.10. The Transport Assessment proposes the following forecast for the additional traffic volumes generated by the proposed Care Home.

Trip Generation for 40 Bed Care Home	Trip Rate Arrivals	Trip Rate Departures	Trip Rate Total
AM Peak Period (08:00-09:00)	2.96	2.12	5.08
PM Peak Period (17:00-18:00)	1.80	3.60	5.40
Daily Trip Rate	34.00	35.28	69.28

- A 4.11. No supporting evidence is provided for these figures¹². However, as shown in Appendix C, the Parish Council calculates that the staff to bed ratio in residential care homes in England in 2020/21 was 1.25 to 1.¹³

⁸ Transport Assessment, pages 107-108

⁹ Survey conducted using Google real-time travel data for 6am-9am on Tuesday 29th November, 2022

¹⁰ Source ONS Census Data 2011, Table QS701EW statistics for Tisbury built-up area

¹¹ TRICS Good Practice Guide 2021 Paragraph 4.7 (A5)

¹² Transport Assessment, table 6.6

- A 4.12. In the case of a 40-bed residential care home this ratio gives rise to a total of 100 movements each day. Based on the modal share for journeys to work from Tisbury built-up area taken from the 2011 Census¹⁴ 71% of these movements, or 71 journeys would be driving or riding a motor vehicle and a further 3.5% or 3 journeys as a passenger in a motor vehicle.
- A 4.13. In addition, the care home will generate movements of visitors, medical professionals, deliveries, utilities and contractors, which are absent from the assessment. The Parish Council considers that these movements should be assessed using reliable data from existing care establishments. In the absence of evidence-based data it concludes that an estimate of 100 movements per day (including an optimism bias) is realistic.

Site-specific factors

- A 4.14. The Highways Officer's report highlights the lengthy, circuitous pedestrian route proposed between the Station Works site and Tisbury village, together with its lack of lighting and pavements in many places.¹⁵
- A 4.15. These comments are echoed in many representations to the planning consultation in November 2021 which stressed that the proposal site's physical isolation and the uninviting nature of the proposed pedestrian and cycle route will generate additional vehicle journeys. To save Inquiry time, the Parish Council has provided a summary analysis of the public representations made¹⁶.
- A 4.16. The Parish Council considers that these comments are reasonable and that the access scheme will indeed generate additional journeys over and above those which could be expected were the proposal site to benefit from a more direct and convenient pedestrian and cycle connection to Tisbury village.
- A 4.17. These site-specific factors have not been taken into account in the Transport Assessment, and in the absence of any evidence-based assessment the Parish Council considers that a provision of up to 200 movements (100 return trips) per day originating from the 86 dwellings and care home or directed to them from other areas of the village, is a prudent provision (including optimism bias). In the Parish Council's view this takes into account the fact that whilst the site is located approximately 450 metres from the centre of Tisbury as the crow flies, the return walking distance is approximately 1.58 km.

Effect of Covid

- A 4.18. The Transport Assessment indicates that the traffic model is based on baseline figures for existing traffic volumes derived from automatic traffic counts undertaken for seven days between 26th November and 04th December 2020 on Jobbers Lane, between the Three Arch Bridge and the current southern arm of the site access road¹⁷

¹³ Please refer to Appendix C. The number of residential care home beds in 2020/21 was 237,900, whilst the workforce was 298,550.

¹⁴ Census 2011, table QS701EW for Tisbury and West Tisbury parishes.

¹⁵ Highway Officer Report dated 22nd July, 2022 (A6)

¹⁶ Appendix D - Report on Community Representations provides a helpful synopsis of the comments made.

¹⁷ Transport Assessment, paragraph 4.17

- A 4.19. The Parish Council considers that these statistics are questionable as they were produced during a period of national lockdown which ended on 2nd December 2020, followed by a period during which tiered restrictions applied¹⁸.
- A 4.20. It notes that the baseline total of through trips under the Three Arch Bridge between 8am and 9am assumed by the traffic model is 212 Passenger Car Units (PCUs)¹⁹ based on this analysis.
- A 4.21. However, a manual traffic count performed for the previous landowner at the same times as far back as 4th November 2003 measured 216 PCU²⁰s and traffic volumes are understood to have grown significantly in the intervening 20 years.
- A 4.22. As a result, the Parish Council considers there is a significant risk in relying on a traffic projection generated from the proposed baseline

Adjustment for peaks arising from the railway

- A 4.23. A number of representations from members of the public pointed to significant peaks in vehicle traffic through the Three Arch Bridge and in the vicinity of the railway station at times of the hourly train departures.
- A 4.24. The Parish Council estimates that approximately 70% of railway station passengers are conveyed to the station by car or van, either driving their own vehicle or receiving a lift.
- A 4.25. Because of the need for trains to use the “Tisbury loop” adjacent to the station to pass one another, train arrivals at Tisbury generally take place in pairs, with a down and up train arriving within a few minutes of one another.
- A 4.26. The Parish Council considers that the Traffic Model does not take account of these peaks and troughs in usage, even though it is reasonable to consider they will have a significant effect on the traffic calculation.

Adjustment for Railway Enhancement

- A 4.27. The Neighbourhood Plan makes clear that “Investment and modernisation of the local railway network (including Tisbury Railway Station) will need to be included as part of the comprehensive development of Station Works”.²¹
- A 4.28. It indicates that this should be achieved through a comprehensive masterplan which includes an assessment of future movement and parking needs arising from the proposed enhancement of the line, addition of a second platform and national policy to promote sustainable methods of travel.
- A 4.29. This assessment is not referred to in the Transport Assessment or Planning Statement.
- A 4.30. In the absence of reliable evidence-based data agreed with Network Rail, the Parish Council considers that the only reasonable course is to apply an uplift to the estimated usage figure for Tisbury Station for the last full pre-Covid year of 2018-2019.
- A 4.31. The usage figure calculated by the Office for Rail and Road for this period was 221,736 total entrances and exits²². The Parish Council considers that a reasonable breakdown of these journeys is as follows:

¹⁸ Timeline of Coronavirus lockdowns March 2020 to March 2021, prepared by the Institute for Government (A7)

¹⁹ Transport Assessment, Appendix 6 Junction Model, Scenario 1

²⁰ Technical Note prepared by Halcrow Ltd. dated 12th November, 2003 to support Planning Application S2003/2547 (A8)

²¹ Tisbury & West Tisbury Neighbourhood Plan, made 2019, pages 6 and 41

Mode	Modal share	Annual Entrances/ Exits	Multiplier (vehicle trips per entrance/ exit	Annual vehicle movements
Arriving on foot	30%	66,520	0	0
Driving own vehicles	20%	44,347	1	44,347
Receiving lifts	50%	110,869	1.5	166,303
Vehicle movements				210,650

- A 4.32. Based on these data, the Parish Council considers a reasonable estimate is that the combination of the West of England line upgrade, expansion Tisbury station, additional station parking and the desired modal shift towards more sustainable forms of travel will generate an additional **180** vehicle movements along Jobbers Lane each weekday during the period 2026 to 2036. A supporting calculation is provided at Appendix B.

Traffic Model

- A 4.33. One member of the public responding to the Planning Consultation in 2021 pointed out that the traffic model shown in the Transport Assessment does not appear to be based on the consultant's own traffic projection set out earlier in the same document.
- A 4.34. The issue arises from the following apparent discrepancy between different parts of the Transport Assessment:
- the key conclusion on page 22 is that the projected number of additional vehicle movements generated by the proposed development during peak hours is 41 in the morning peak between 8-9am and 41 again at the evening peak between 5pm and 6pm; and
 - by contrast all six traffic models for the period 2021 and 2028 shown on pages 75-80 have been run on the basis that 45 vehicles in total will be entering or leaving the Station Works site.
- A 4.35. It is possible that the consultants consider that the additional vehicle movements resulting from development will be matched by a corresponding reduction resulting from the closure of the existing businesses at the site, leading to a net zero effect.
- A 4.36. However, if this is the assumption it is not stated or supported by any evidence.
- A 4.37. As the traffic model is key to the case for the proposed access scheme, the Parish Council considers that the reasons for this discrepancy should be satisfactorily resolved, and if necessary the traffic model should be re-run

²² Office of Rail Regulation – “Train Station Usage” published January 2020

5. Safety of Pedestrians, Cyclists and Motorists

- A 5.1. Public responses to the planning consultation raised concerns regarding the practicality and safety of the proposed access scheme.
- A 5.2. The Parish Council considers that a number of these concerns go to the heart of the scheme and support the view of the Wiltshire Highways Officer that an alternative approach is required. They would regrettably, in the Parish Council's view, constitute an additional reason for refusal of the scheme in its current form because of the risks to the safety of those using the road near the scheme and harm to the wellbeing of its residents.
- A 5.3. There are four areas where the Transport Assessment access does not, in the view of the Parish Council, provide sufficient evidence that these risks have been addressed that highway safety will not be unacceptably compromised:
- operation of the scheme during periods of equipment failure, and in particular a means of overcoming the very poor visibility on approaching the existing Northbound arch of the Three Arch Bridge (which would become the only arch for use by motor vehicles) from its Northern side;
 - the needs of, and the impact of the vehicle repair business located at the Old Council Yard, inside the proposed traffic controlled zone, but not apparently governed by it;
 - narrow carriageway widths and areas of road without a pavement at the Northern approach; and
 - the impacts of the scheme on both pedestrians and cyclists approaching the Three Arch Bridge from Tisbury village and upon road cyclists not wishing to visit the proposed development and therefore remaining on the carriageway to pass under the bridge.

Fail-open conditions

- A 5.4. One of the public representations asked what would happen at times when the proposed light controlled signals fail, through fault or lack of power.
- A 5.5. Operation of the scheme for temporary periods without signals would, in the Parish Council's view, represent an unmitigated risk as visibility is limited for the following reasons:
- the sharp curve of Jobbers Lane/Station Road immediately to the North of the Three Arch Bridge;
 - the length of the bridge arch, meaning that full visibility of the carriageway through the arch from the North is only possible when immediately in front of it;
 - poor light conditions under the arches, making oncoming cyclists in particular difficult to see; and
 - the narrow width of the carriageway for some distance either side of the bridge.
- A 5.6. The Transport Assessment refers to Jobbers Lane as "a local distributor road serving traffic into Tisbury Village Centre northbound and providing connections to the A30 moving southbound.²³" The Parish Council would agree with this assessment.

²³ Transport Assessment, paragraph 4.3

- A 5.7. However, the Transport Assessment does not consider the “fail open” operation of the access scheme and the Parish Council considers that the access scheme will require fundamental reappraisal if the risks referred to above cannot be resolved.

Vehicle Repair Business at the Old Council Yard

- A 5.8. Appendix D shows the location and setting of the vehicle repair business situated at the Old Council Yard alongside the Three Arch Bridge.
- A 5.9. Representations from members of the public to the planning consultation expressed concern that the needs of this business, and its impact on the overall access scheme had been overlooked.
- A 5.10. The business is located in the centre of the controlled zone which is central to the proposed access scheme, but, critically, would not be governed by it.
- A 5.11. When operating, the business generates vehicle movements to and from its premises.
- A 5.12. However, the driver of a vehicle exiting the business site during a pedestrian phase (when the traffic lights are all red) will not be aware which queue of traffic (to their left or their right) will have right of way when the signals change.
- A 5.13. The risk is heightened because the carriageway between the Old Council Yard exit and each set of traffic lights will be single file under the new scheme, meaning that if a driver exiting finds that vehicles are approaching them, they will need to reverse back.
- A 5.14. The Transport Assessment is silent on this matter.
- A 5.15. Taking into account the nature and setting of this business, the Parish Council considers this arrangement would attract an unacceptable level of risk, requiring a thorough redesign of the proposed junction model.

Carriageway widths and areas without pavements

- A 5.16. Appendix C shows the areas of up to 30 metres ahead of the signal stop lines, over which vehicles will be queuing at a red signal on the Northern and Southern approach to the Three Arch Bridge.
- A 5.17. In 2021, representations from members of the public questioned the carriageway width in this zone along the Northern approach to the bridge, which reduces to approximately 6 metres in places.
- A 5.18. Pictures of this section of road are provided at Appendix C.
- A 5.19. In their submission, Dorset and Wiltshire Fire and Rescue Service provided a plan showing the chief area of concern. It comments that the road along much of this stretch can only support a single vehicle, that there is no provision for a pavement and that as a result of the carriageway configuration they would not be able to proceed with caution at a red light. Their comments and the plan, as it appears in the applicant's Statement of Community Involvement²⁴, are also reproduced in Appendix C.
- A 5.20. Representations from the public also highlighted the problems along this stretch of road posed by a combination of pedestrians with limited mobility, cyclists, standing Southbound traffic waiting to use the Three Arch Bridge and emerging Northbound traffic, including commercial vehicles accelerating out from the bridge.

²⁴ Statement of Community Involvement, paragraph 4.11 (S10)

- A 5.21. The Parish Council considers that the Transport Assessment provides no answer to these problems and that both commercial and emergency vehicles would have considerable difficulty passing a queue of stationary traffic after emerging from the Three Arch Bridge on the Northern side.
- A 5.22. It therefore agrees with those representations which state that the issues at the Northern approach represent a significant risk to the safety of cyclists and pedestrians. It considers that significant rework is required to enable the access scheme to overcome these problems, which are too extensive to support approval of the current proposal, even with condition.

6. Length and difficulty of the pedestrian route

- A 6.1. The public responses to the planning consultation in 2021 raised a number of concerns regarding the length and difficulty of the proposed pedestrian and cycle route between the proposal site and Tisbury village and questioned why the access scheme did not incorporate construction of a direct pedestrian and cycle route, as envisaged by the Neighbourhood Plan.
- A 6.2. Many responses pointed to matters which have been raised by Wiltshire Council, but in addition, public responses questioned:
- the extent to which the proposal site would become isolated from Tisbury village as a result of the lack of direct and convenient pedestrian and cycle access; and
 - the extent to which the site's segregation will hinder objectives to promote active modes of travel.
- A 6.3. On both questions, the Parish Council concludes that the arrangements presented in the Transport Assessment, do give rise to significant risk of harm, both to the residents of the proposed scheme and the wider community.

Isolation

- A 6.4. The proposal site is formed of a long, narrow strip of land approximately 400 metres in length and 60 metres in width. The most practical means of access to the site are at its North-eastern and South-western ends.
- A 6.5. Limiting all access (both vehicular and pedestrian) to a single access route at the South-western end inevitably creates a long and narrow cul-de-sac, served by a spine road whose entrance will be facing away from Tisbury village and towards the open countryside.
- A 6.6. A further sense of isolation will result from the hard boundaries along three sides of the site:
- the North-western side will be fenced off from the railway at the request of Network Rail²⁵;
 - the South-eastern side and North-eastern sides are bounded by a steep hill with no paths²⁶.

²⁵ Planning Statement, paragraph 9.6

²⁶ Planning Statement, paragraph 7.6

- A 6.7. The Parish Council considers that as a result of these restrictions, the proposal will deliver a site which is effectively sealed in on three sides, designed as a long cul-de-sac, without the benefit of through access, and with its single entrance facing open countryside
- A 6.8. Appendix F shows two alternative walking routes between the middle of the site and Tisbury village centre:
- the route proposed in the access scheme (route 'A' in red)
 - the direct route envisaged by the Neighbourhood Plan (route 'B' in amber)
- A 6.9. The return walking distances by these routes to and from Tisbury village centre and its Recreation Ground are summarised in the table below:

Return walking route	Route A - Proposed	Route B - Direct
Site centre to Tisbury village centre	1.58 Km	856 metres
Site centre to Tisbury Recreation Ground	1.58 Km	428 metres
North-east end of site to Tisbury village centre	1.9 Km	710 metres
North-east end of site to Tisbury Recreation Ground	1.9 Km	240 metres

- A 6.10. The Parish Council notes the importance attached to the provision of safe and easy walking access to local facilities for both children and older people.
- A 6.11. In the case of children, it notes the requirement of Wiltshire Core Policy S2 (saved Salisbury Local Plan Appendix IV) that children's play areas should be provided within a safe walking distance of no further than 200 metres from home for pre-school children and 400 metres for older children and should be easily accessible from the development²⁷.
- A 6.12. In the case of older people, it notes the findings set out in "More Choice, Greater Voice" published by the Care Services Improvement Partnership that:
- housing for older people should be no further than 400 metres walking distance from a general store, a newsagents, post office, library, pharmacy, doctor's surgery and places of worship; and
 - the locations most favoured by older people are those which are well-located, in busy areas with good access. 80% of older people use local shops "almost daily" or more often. 40% use the library or post office almost daily²⁸.
- A 6.13. National planning policy requires that the needs of those with reduced mobility should be fully taken into account and that applications should be refused which do not "*address the needs of people with disabilities and reduced mobility in relation to all modes of transport*"²⁹

²⁷ Saved Salisbury District Local Plan 2011, Appendix IV, Open Space Requirements (B16)

²⁸ [More Choice, Greater Voice](#), Nigel Appleton, 2008, published by the Care Services Improvement Partnership (A9)

²⁹ National Planning Policy Framework, paragraphs 110 and 112.

- A 6.14. The Parish Council also notes that National Planning Policy requires that planning decisions should “*create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*”³⁰
- A 6.15. In the Parish Council’s view:
- the proposed scheme will lead to a noticeable sense of isolation resulting from the site’s physical setting, hard boundaries, made more severe at times of disruption or flooding at the Bridge; and
 - this risk will be more pronounced for those residents at the proposed care home, whose greater vulnerability will make them more sensitive to isolation.

Air Quality and Sustainable Travel

- A 6.16. Appendix E uses a calculation based on Euro 6 emission standards³¹ to assess the air quality impact resulting from the use of motor vehicles for journeys between the proposal site and Tisbury village which would have been made on foot or by cycle had a direct and safe route existed.
- A 6.17. Dialogue with the Air Quality Officer for the London Borough of Camden undertaken on behalf of the Parish Council, has indicated that whilst no formal standards exist to measure the air quality impact of travel arising from development, this approach provides a reasonable indication of the air quality impact.
- A 6.18. The calculation shows the isolation of the proposal site resulting from the proposed access scheme and the lack of a direct and convenient pedestrian access can be expected to lead to the following **additional** vehicle emissions each year compared to those of a site which is well-connected:
- CO² annual emission - between 1.6 tonnes and 7.5 tonnes annually
 - NO² annual emission – between 0.7 kg and 63.4 kg annually
 - Particulates annual emission – between 0.1 and 0.3 kg annually
- A 6.19. Taking all these factors into account, the Parish Council considers that insufficient evidence has been offered to demonstrate that the site will not result in significant harm to the wellbeing of its residents and the wider community through social isolation, unnecessary air pollution and by failing to sufficiently promote opportunities for active travel.
- A 6.20. In addition, for the reasons set out elsewhere in this document the Parish Council considers that significant re-working is required to the traffic model before an accurate assessment is possible of the impact of vehicle emissions arising from traffic queueing at the signal controls, and in particular their effect on pedestrians and cyclists given the narrow pavement and carriageway widths on the approaches to the traffic signals.
- A 6.21. The Parish Council will present that the root cause of these issues lies with the fundamental decision to route access through the proposed lengthy and uninviting route, without

³⁰ National Planning Policy Framework, 2021, paragraphs 92 and 130

³¹ ³¹ Euro 6 emission levels are taken from “Explaining Road Transport Emissions – a Non-Technical Guide” published by the European Environment Agency 2016 (A10)

investing in a direct and safe pedestrian and cycle connection envisaged by the Neighbourhood Plan.

- A 6.22. It is the Parish Council's view that these issues cannot be resolved by condition and that the proposed access scheme requires significant re-working for this reason.

Chantry Footpath FP16

- A 6.23. Public representations have highlighted the impact of the access scheme on the Chantry Footpath which crosses the railway at a level crossing close to the North-west corner of the site.
- A 6.24. The Planning Statement³² and Statement of Community Involvement³³ both indicate that the access scheme will make it necessary to seal off the proposal site along its entire border with the railway and prohibit access to the Chantry Footpath to avoid the risk that residents of the estate will attempt to use this footpath and the existing pedestrian level crossing over the railway to access Tisbury village.
- A 6.25. To prevent residents finding a way through any boundary treatment, the only realistic solution is likely to be to seek the closure of this footpath and the Statement of Community Involvement records this objective.³⁴
- A 6.26. The Parish Council consider this to be an important local footpath for the following reasons:
- it offers important panorama of Tisbury village which is valued by the local community; and
 - it is the only footpath connecting Tisbury with the South and routes towards the Iron Age Hill Fort at Withyslade and is for this reason highly valued by Tisbury's community, as reflected in the seating provided at the top of its ascent from the Station Works site.
- A 6.27. In the Parish Council's view, both the loss or the sealing off of this footpath would serve to reinforce the sense of isolation within the proposal site and the former option would impact upon the wider community. It would conflict with Neighbourhood Plan Policy TR.4 which states support for *"the protection and expansion of rights of way for footpaths, bridle and cycle paths to encourage sustainable transport patterns within the village and its surrounding areas."*

³² Planning Statement, paragraph 3.16

³³ Statement of Community Involvement, Appendix [A] – notes of meeting on 26th April 2021 (S12)

³⁴ Statement of Community Involvement, Appendix [A] – notes of meeting on 26th April 2021 (S12)

7. Flood Risk

- A 7.1. The proposal is accompanied by a Flood Risk Assessment & Drainage Strategy prepared by Campbell Reith LLP and dated September, 2021. Appendix C of Campbell Reith's report provides a map which shows the ground level on the Northbound arch of the Three Arch Bridge (the arch to be reserved for motor vehicles and "through" cyclists under the access scheme) to be 90.55 metres AOD (Above Ordnance Datum).
- A 7.2. The report provides the following forecast of maximum flood water levels at this location, (with a 1% chance of being met or exceeded in any given year), making two alternative allowances for climate change:

Table 5.4: Extrapolated Result Analysis

Return Period	Extrapolated Result for High Central allowance category using stage discharge relationship (Exponential) Level (mAOD)
100yr+40%CC_Undefended	92.38
100yr+85%CC_Undefended	92.85

- A 7.3. Following a number of questions from the Environment Agency, Campbell Reith amended the figure of 92.38 to 91.7 on 22nd April, 2022, indicating that the latter was "the design flood level"³⁵ for the proposed elevated walkway at the Three Arch Bridge.

Three Arch Bridge

- A 7.4. 79 members of the public making representations to the planning consultation (30% of the total) raised the question of flooding to the road under the Three Arch Bridge in view of the severe flooding event which occurred on 21st October, 2021, when flood waters reached 91.3 metres AOD at the Environment Agency's monitoring station, located close to the River Nadder bridge (Pool Bridge) towards the North-eastern end of Station Road.
- A 7.5. A number of representations made clear that the effect of flooding on the road under the Three Arch Bridge made it impassable on 21st October, 2021.
- A 7.6. Appendix G plots river levels as measured at the monitoring station over the ten years 2011 to 2021. It is clear from this data that flooding of the River Nadder to levels exceeding 90.55 metres are roughly a one in ten year event at present, although the dip in the road surface on either side of the bridge results in more frequent instances of localised flooding.
- A 7.7. The area under the Three Arch Bridge along with much of the Nadder Floodplain around Tisbury was re-designated a Zone 3b functional floodplain under Wiltshire Council's Strategic Flood Risk Assessment issued in May 2019³⁶
- A 7.8. On 19th May 2022, the Environment Agency asked for a more thorough hydraulic model to confirm that the proposed pedestrian walkway will remain safe in times of flood, will not result in a loss of flood plain storage and will not impede water flows through the bridge (thereby increasing flood risk elsewhere).³⁷

³⁵ As reported in Campbell Reith's letter to Simon Trueick at Intelligent Land on 5th July, 2022 (A11)

³⁶ Wiltshire Level 1 Strategic Flood Risk Assessment, May 2019, paragraph 3.3.3 (S15) and Appendix C map (S16)

³⁷ Environment Agency response to Wiltshire Council published 19th May, 2022 (A12)

- A 7.9. This appears to be a matter of dispute³⁸ and in their letter of 5th July, 2022, Campbell Reith accept that flooding of the pedestrian access route may occur from time to time, proposing that *“an appropriate and effective response ... could be achieved through simple and clear signage confirming that the structure should not be used if flood water extended to a specified point, or more technical solutions such as warning lights/automated gates if water reached a certain level)”*³⁹
- A 7.10. The Parish Council consider this to be a significant issue because the access scheme funnels all journeys to and from the proposal site through the single access point at its South-western end on Jobbers Lane. Even though a public footpath borders the site at its North-eastern end, the Planning Statement indicates that *“the development will also be fenced off from the existing gated pedestrian footpath level crossing to ensure public safety by removing potential for significant increase in use of the crossing. These provisions have been supported by Network Rail.”*⁴⁰
- A 7.11. The Parish Council notes the recommendation in Planning Policy Guidance that *“Where access and egress is important to the overall safety of the development, this should be discussed with the local planning authority and Environment Agency at the earliest stage, as this can affect the overall design of the development.”*⁴¹
- A 7.12. In the Parish Council’s view the choice of location for the proposed care home will make it unduly susceptible to disruption to medical services and essential deliveries resulting from disruption at the Three Arch Bridge.
- A 7.13. For these reasons the Parish Council supports the view of the Environment Agency that the proposal does not give sufficient reassurance that flood risk has been fully understood and appropriately mitigated.
- A 7.14. The Parish Council would go further and will present that these problems go to the heart of the proposed access scheme and from the decision to promote a stand-alone access scheme for the site, without the benefit of a comprehensive masterplan. For this reason it considers it most unlikely that they can be resolved by condition.

Flooding of the Stubbles Footpath

- A 7.15. The Parish Council notes that flooding along the remainder of the proposed pedestrian access route, and particularly along the Stubbles Footpath, occurs more frequently.
- A 7.16. Appendix I shows pictures of flooding of the Three Arch Bridge in 2021 and the Stubbles Footpath in 2016 and 2021. A separate document, “October 2021 Flood Event” included with the appeal documents provides further images⁴².
- A 7.17. Appendix I also shows the Stubbles Footpath on 28th March 2016, when the recorded level of the River Nadder at the Environment Agency Monitoring Station near Poole Bridge nearby reached 90.23 metres Above Ordnance Datum (AOD). Environment Agency records indicate that water levels reached or exceeded this level on four occasions since 26th November, 2012:
- 16th March, 2013

³⁸ Letters Campbell Reith LLP to Simon Trueick 5th July, 2022 (A11) and Environment Agency to Wiltshire Council, 18th August 2022 (A13)

³⁹ Letter Campbell Reith LLP to Simon Trueick 5th July, 2022 (A11)

⁴⁰ Planning Statement, paragraph 9.6

⁴¹ Planning Practice Guidance, “Flood Risk and Coastal Change”, paragraph 039 Reference ID: 7-039-20140306

⁴² Flood Event, 21st October, 2021 (A14)

- 24th November, 2013
- 28th March, 2016
- 21st October, 2021.

8. Resilience of the local road system

Constraints imposed at the Three Arch Bridge

- A 8.1. The Three Arch Bridge already represents a key constraint in the local road network, because of the reduced height and width of the bridge arches.
- A 8.2. As a result of these constraints:
- only certain fire engines, currently deployed only at Tisbury and Mere fire stations, are capable of passing through the bridge⁴³
 - construction traffic attempting to access the Station Works site is almost always required to approach the site along the narrow lanes to the South of the Three Arch Bridge, rather than from the A303 trunk road which lies some miles to its North, because they cannot pass under its arches.
- A 8.3. The Parish Council considers that the access scheme creates additional constraints at the Three Arch Bridge whose cumulative effect will be to impair the resilience of the local road network to an unacceptable degree. These are:
- the requirement for one-way working and the imposition of signal controls will make it more difficult for the Bridge to cope with unexpected demand;
 - the funnelling of traffic in both directions through a single Northbound arch means that any breakdown, maintenance or emergency work to this single arch would make the road unusable in both directions;
 - the reduced size of the Northbound arch (through which all traffic would be funnelled) compared with the Southbound arch offers even less room for contingency than currently exists; and
 - the impact on surrounding country lanes, and in particular the lane through Tisbury Row at times when the Three Arch Bridge was blocked or affected by bottle-necks.
- A 8.4. The Parish Council considers that the limited capacity of the local 'C' road system, the effect of long-standing road constrictions nearby at Fonthill Gifford, Fonthill Bishop and Newtown combined with pressure arising from the recent development of 90 homes at the Wyndham Estate, have led to an unusual degree of fragility in the local road network, of which the three Arch Bridge represents a significant 'pinch point'.

Size of emergency vehicles

- A 8.5. The Parish Council consider that the access scheme presents a specific problem by offering no room for contingency in the size of emergency vehicles.
- A 8.6. The pictures at Appendix H show the plated heights of the Northbound and Southbound vehicle arches. They are followed by pictures showing one of the fire tenders which is

⁴³ Transport Assessment, appendix 5

- currently capable of passing through the Three Arch Bridge, courtesy of Dorset & Wiltshire Fire and Rescue⁴⁴
- A 8.7. The Statement of Community involvement indicates that the fire engine pictured has a height of 9 feet 8 inches whilst the plated height of the Northbound arch it is passing through is 9 feet 9 inches.
- A 8.8. Whilst this may be a miscalculation, the Parish Council notes:
- that even in current circumstances, clearances are very small;
 - that the width of the Northbound arch (the only arch available to traffic as a result of the access scheme) is 6 inches or 15cm lower than the Southbound arch and significantly narrower as a result of the pedestrian walkway along one side, forcing vehicles towards away from the centre of the arch, meaning that the available height is reduced by the curve of the arch itself; and
 - that the fire engine pictured is one of only a few used by the Dorset & Wiltshire Fire Service which are capable of passing through the Three Arch Bridge at the current time.
- A 8.9. The Parish Council considers in the current circumstances, reducing headroom beyond the existing restrictions at the Bridge would pose a significant issue because once development proceeds the access arrangements will be very difficult to reverse. If, for example, new fire tenders with a height of 10 feet were introduced, it would not be possible for them to drive through the Bridge, even though they could achieve this currently.

Impact on surrounding roads

- A 8.10. A number of public representations pointed to the risk of unacceptable pressure on surrounding lanes in the event that vehicle queuing at the Three Arch Bridge becomes common and motorists seek alternative routes into and out of Tisbury.
- A 8.11. A particular concern raised relates to Tisbury Row, which is currently a quiet road often used by ramblers and horse riders, which could not function as an overflow.
- A 8.12. The Transport Assessment does not include any assessment of the impact on surrounding roads resulting from the proposed traffic controls at the Three Arch Bridge.
- A 8.13. Inevitably pressure on surrounding roads will be a function of queuing, which itself will depend upon the accuracy of the traffic forecasts and the capacity of the junction.
- A 8.14. The Parish Council considers it common ground that the network of 'C' class roads serving Tisbury is poor and therefore considers that further work on the proposed access scheme is required to provide decision-makers with the necessary confidence that these matters have been taken into account and that the proposed scheme will not lead to undue levels of pressure on surrounding roads.

9. Conclusion and Next Steps

Reasons for rejection of the proposed scheme

- A 9.1. The Parish Council considers that the proposed alternative access scheme will create a single point of failure at the Three Arch Bridge, meaning that any proposal must command a high level of confidence that it will work well in practice.

⁴⁴ Reproduced from the Statement of Community Involvement, page 8 (S10).

- A 9.2. Based on the information provided to date, the Parish Council has concluded that the access scheme does not command this level of confidence, and presents a real risk:
- that pedestrians and cyclists will be put in danger;
 - that traffic volumes will result in bottle-necks, leading to unmanaged pressure on surrounding roads;
 - that residents of the proposed development, and particularly the proposed care home would become unduly isolated due to the length and difficulty of the proposed pedestrian access route to and from Tisbury village;
 - that the difficulty of the pedestrian route will lead to significant use of motor vehicles for short journeys into the village, thereby frustrating objectives to promote active forms of travel and reduce air pollution; and
 - that disruption to vehicle flows at the Three Arch Bridge, whether from flooding, equipment breakdown or the reduced size of the remaining vehicle arch, will cause unacceptable disruption to essential services and to the surrounding country lands.
- A 9.3. The Parish Council considers that most of these issues go to the heart of the proposed access scheme and result from significant deviation from the approach set out in the Neighbourhood Plan:
- in the choice of access route; and
 - in the decision not to develop a comprehensive masterplan for the site, dealing with its various challenges in a coherent way, and with the support of key stakeholders.

The Parish Council's proposal

- A 9.4. The Parish Council acknowledges that the challenges presented by the site need to be overcome. It is conscious of the reasons why previous planning applications have been refused and remains committed to the site's allocation for development as set out in the Neighbourhood Plan.
- A 9.5. It is recognised that these challenges can only be addressed through a genuine resolve on the part of the landowner and other local stakeholders to introduce the necessary infrastructure in the form of a direct pedestrian and cycle link to connect the proposal site to Tisbury village through the construction of a step-free bridge or underpass across the railway at the North-Eastern corner of the site as envisaged by the Neighbourhood Plan, and to integrate these works with the proposed railway enhancement.
- A 9.6. Whilst other alternative approaches could be proposed, the Parish Council's view is that none could address the problems represented by the access scheme which is currently proposed.
- A 9.7. Whilst a direct access route would be more costly to implement, the Parish Council notes that it would save approximately £250,000 of build costs, based on the appellant's own estimates.⁴⁵
- A 9.8. The Parish Council considers that the right scheme should not be funded from development alone, in view of its dual benefit to both the proposal site and the railway network. A key driver of success will therefore be to secure the commitment of Wiltshire Council and Network Rail to the earliest possible implementation of such a scheme, which is a pre-requisite for enhancement of the West of England line set out in Network Rail's West of England Line Study 2020, to which it is committed.

⁴⁵ Affordable Housing Viability Statement, paragraph 3.31 (S14)

- A 9.9. This approach is in accordance with Policy TR.2 of the Neighbourhood Plan, which requires a multi-agency approach.
- A 9.10. During 2022 the Qualifying Body held a number of meetings with Network Rail as part of its evidence-gathering work to support the renewal of the Neighbourhood Plan in 2023. The principal objective of these meetings was to confirm that there remains a strong prospect that the rail enhancement at Tisbury will be completed within the lifespan of the Neighbourhood Plan to 2036. Initial contact was made with Network Rail Wessex in mid-July, and seven meetings were held between 28th July, 2022 and 14th December 2022, which were joined from November by a representative from Wiltshire Council. The outcome of this process is summarised in the notes of the most recent meeting.⁴⁶
- A 9.11. In summary, the outcome of these discussions is:
- as DfT funding was not available following the 2020 Comprehensive Spending Review, Network Rail instead secured investment from the Western Gateway Sub National Transport Board (the “WGB”), who are funded by the Department for Transport for 3 years from 2023/4 to promote projects which can deliver significant benefits to communities in the West of England;
 - with sponsorship from the WGB, Network Rail will complete a Strategic Outline Business Case (SOBC), for enhancement of the West of England Line, focusing on Package 1 (involving enhancement of Tisbury Station and reinstatement of its ‘down’ platform) for which preparatory work will start in January 2023 and which is scheduled to report before December 2023;
 - the SOBC will present the business case for Package 1 in view of its strategic benefits, which will include:
 - strategic, economic, financial, commercial and management assessments;
 - a timetable analysis; and
 - a detailed engineering intervention assessment, enabling Network Rail’s initial “optimism bias” in project forecasting of 66% to be significantly reduced;
 - in the view of both Network Rail Wessex and Wiltshire Council “Package 1” would deliver significant benefits in terms of capacity, reliability and performance, including to Wiltshire residents, justifying its prioritisation;
 - Network Rail Wessex recognises that a safe, direct pedestrian and cycle crossing of the line at Tisbury across to the Station Works site is an essential part of “Package 1” and that integration of Network Rail’s works, including the provision of the crossing and enhanced parking facilities, with regeneration of the Station Works site would support development and enable the existing pedestrian level crossing (the “Chantry Crossing”) to be retired, which Network Rail are keen to achieve on safety grounds;
 - to this end, Network Rail Wessex considers an additional Network Rail contribution of £250,000 may be available to bring forward provision of the new railway crossing in advance of other Package 1 components subject to partnership funding commitments from other sources;
 - for its part, Wiltshire Council indicates that a decision has been made to put forward the rail crossing at Tisbury for inclusion in the next update of the Wiltshire Council’s Infrastructure Delivery Plan (“IDP”) due for publication as part of the Infrastructure Funding Statement dated 31st December, 2022, subject to approval by Cabinet,

⁴⁶ Notes of Meeting with Network Rail and Wiltshire Council – 14th December 2022 (S21)

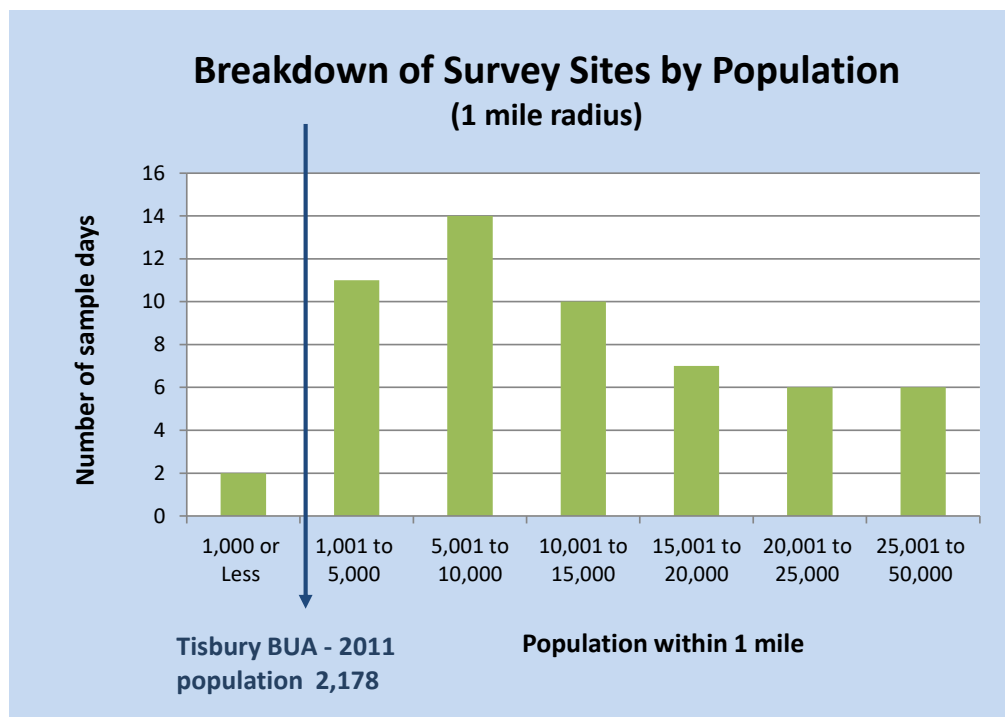
meaning that it will be eligible to receive partnership funding from Wiltshire Council's strategic Community Infrastructure Levy (Infrastructure Development);

- Network Rail Wessex has indicated it would be prepared to consider entering into a Statement of Common Ground with Wiltshire Council, and/or Tisbury Parish Council reflecting the above understanding, similar to that recently agreed between Network Rail and Eastleigh Borough Council in connection with the preparation of its Local Plan.

A 9.12. The Parish Council considers that this approach represents a realistic proposition to deliver a genuinely sustainable mixed development on the site, meeting local housing needs over the lifespan of the Neighbourhood Plan.

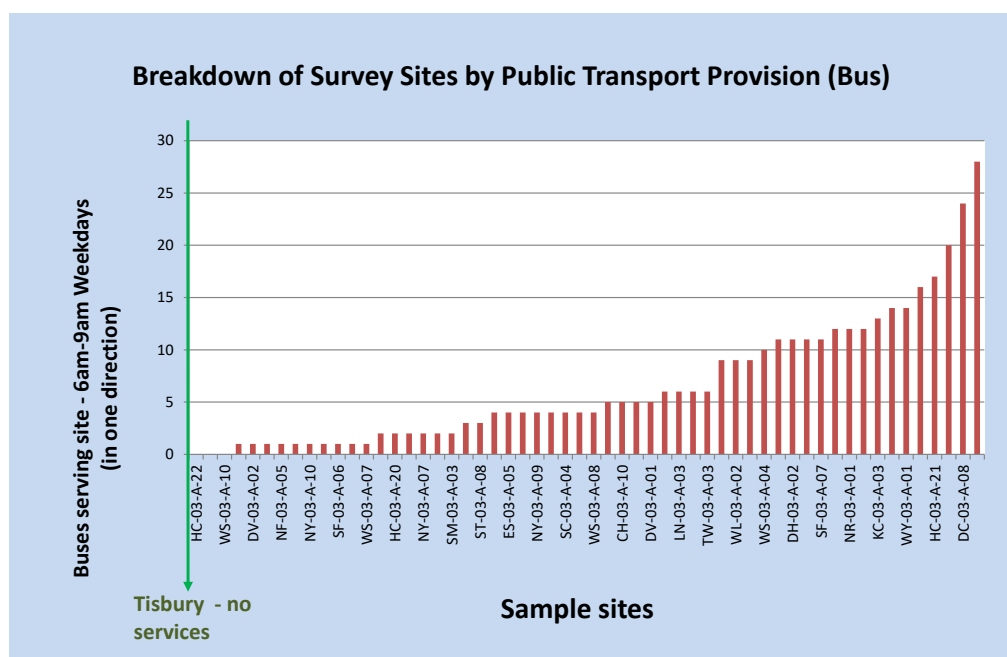
10. Appendix A – Traffic Sample - Houses

Sample Sites – Breakdown by Population living within 1 mile



Source – Transport Assessment, pages 107-108

Sample Sites – Weekday Peak Hour Bus Provision (one direction)



Source – data collected for Tisbury Parish Council from Google timetable information for Tuesday 29th November, 2022 between 6am and 9am for the closest bus stop up to 450 metres.

11. Appendix B – Station/Rail Enhancement

The following calculation is based on reasonable assumptions for the increase in vehicle usage along Jobbers Lane between 2023 and 2035 arising from the proposed West of England line service enhancements, expansion of Tisbury station, provision of additional parking and achievement of the government's objectives for modal shift towards sustainable forms of transport.

ALLOWANCE FOR RAIL/STATION EXPANSION AND MODAL SHIFT

Vehicle Movements - Annual	210,650
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Breakdown of movements between working and non-working days:

Day	Multiplier
Sunday	1
Monday	1.5
Tuesday	1.5
Wednesday	1.5
Thursday	1.5
Friday	1.5
Saturday	1

9.5

% of movements occurring on Weekdays	%
	78.9%

Number of movements occurring on Weekdays	166,303
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Number of Weekdays - Annual	222
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Number of movements per Weekday	749
---------------------------------	-----

% Movements along Jobbers Lane	30%
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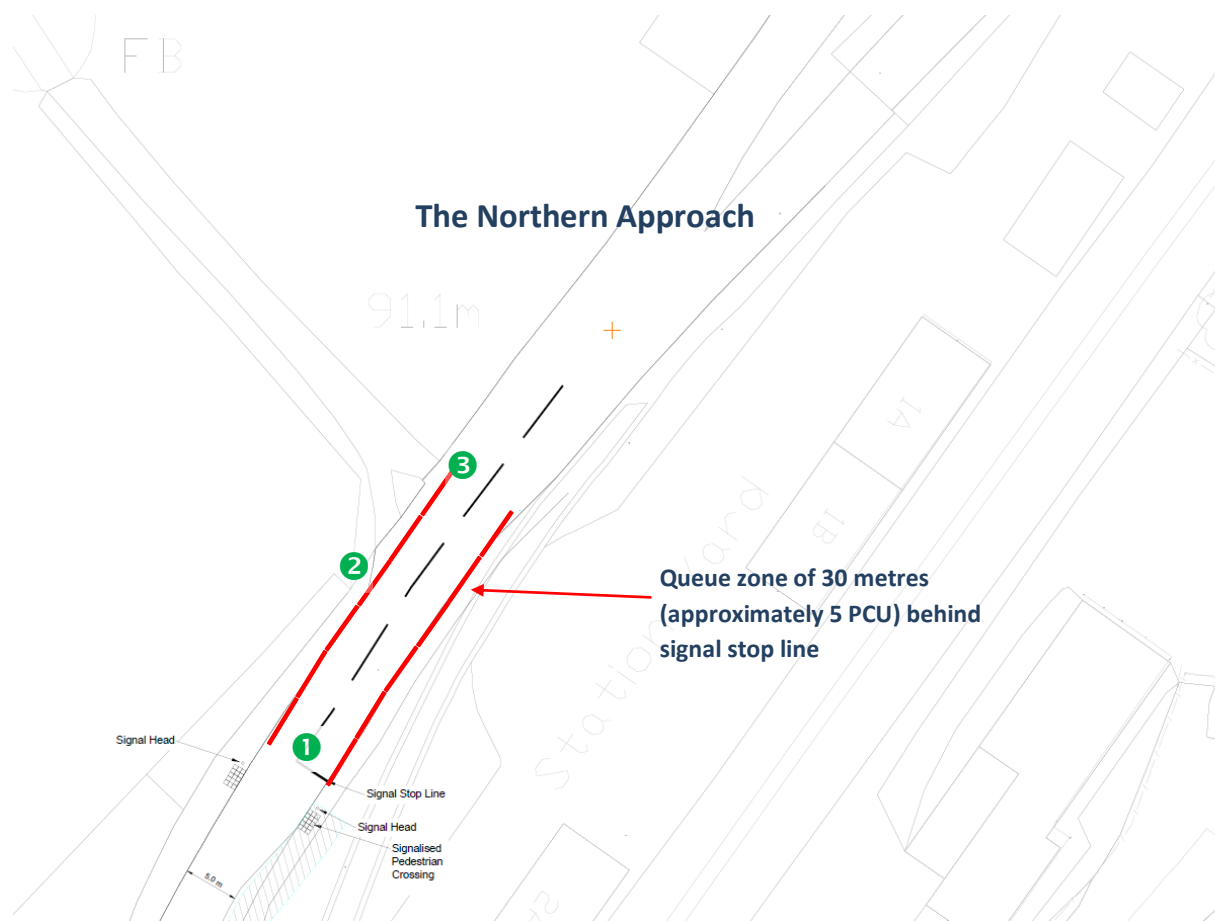
Daily vehicle movements along Jobbers Lane	225
--	-----

Allowance for station expansion, improved service and modal shift to sustainable travel	
2023-2036	80%

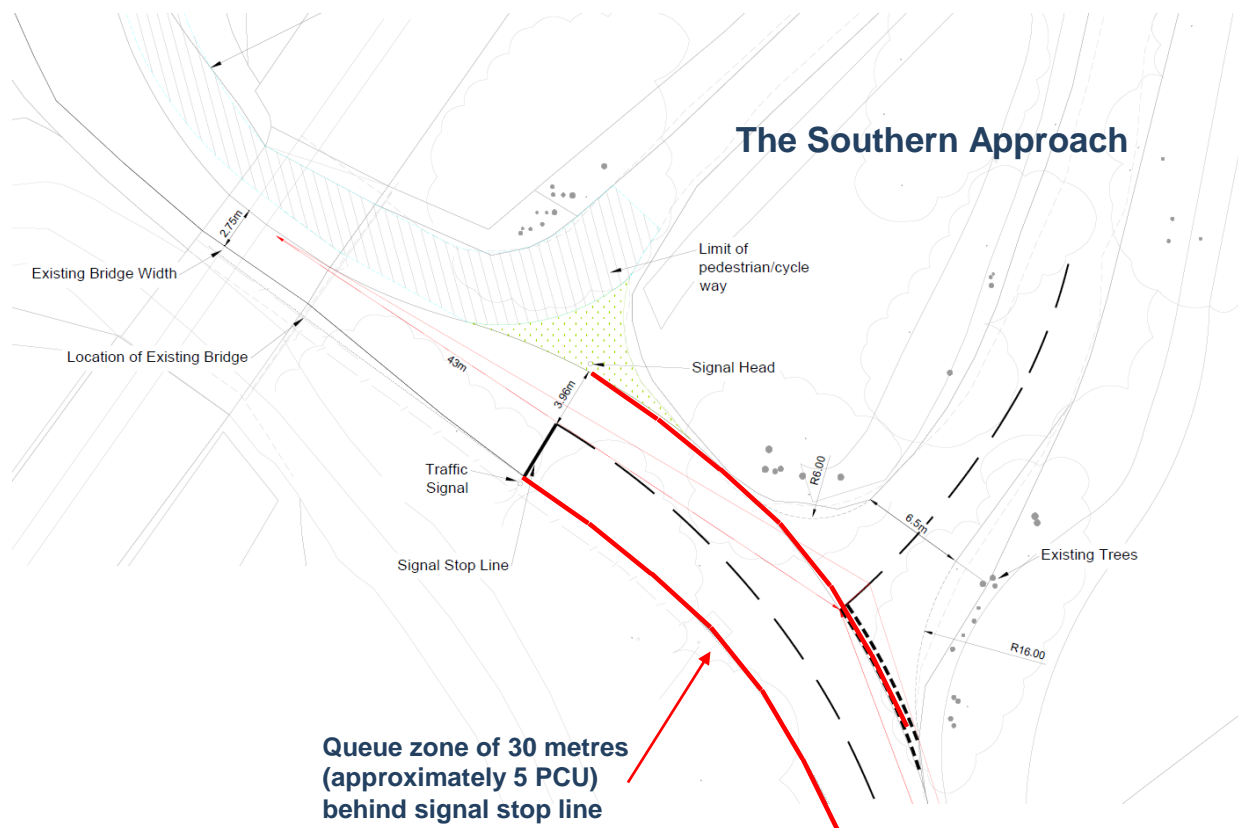
Additional vehicle movements by 2036	180
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12. Appendix C – Carriageway Widths

Northern Approach



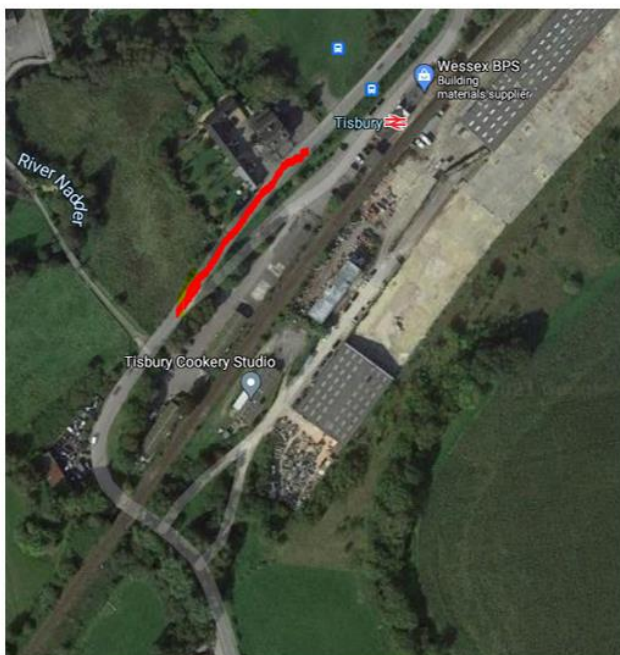
Southern Approach



Comments by Dorset and Wiltshire Fire and Rescue Service

The following comments on the Northern approach appear in the Statement of Community Engagement⁴⁷:

Google maps image of road as it stands the red line is highlighting that is currently wide enough for one car at time. Unsure if any plans to widen or add a pavement as there is no pavement currently. So adding traffic lights could delay us if there is a queue. From the traffic lights we would not be able to proceed with caution on a red light as the red may not be wide enough due to pavements each side



⁴⁷ Statement of Community Involvement, paragraph 4.11 (S10)

Northern Approach – Picture 1

Station Road taken from the location 1 shown in green on the above plan at the signal stop line and looking North-east towards the junction with the Stubbles footpath.

This and all further pictures in this section courtesy of Google LLC.



Northern Approach – Picture 2

Station Road taken from the location 2 shown in green on the above plan at the junction with the Stubbles footpath and looking South-west towards the signal stop line along the area of pavement which pedestrians will need to use.



Northern Approach – Picture 3

Station Road taken from location 3 shown in green on the above plan and looking North-east over the area of road without a pavement which lies between the Stubbles Footpath and the Station Approach Road.

Residents of the proposed development using Tisbury Railway Station or the Recreation Ground will need to walk along this stretch of road.



Northern Approach – Picture 4

Station Road taken from location 4 shown in green on the above plan and looking South-west back towards the junction with the Stubbles footpath.

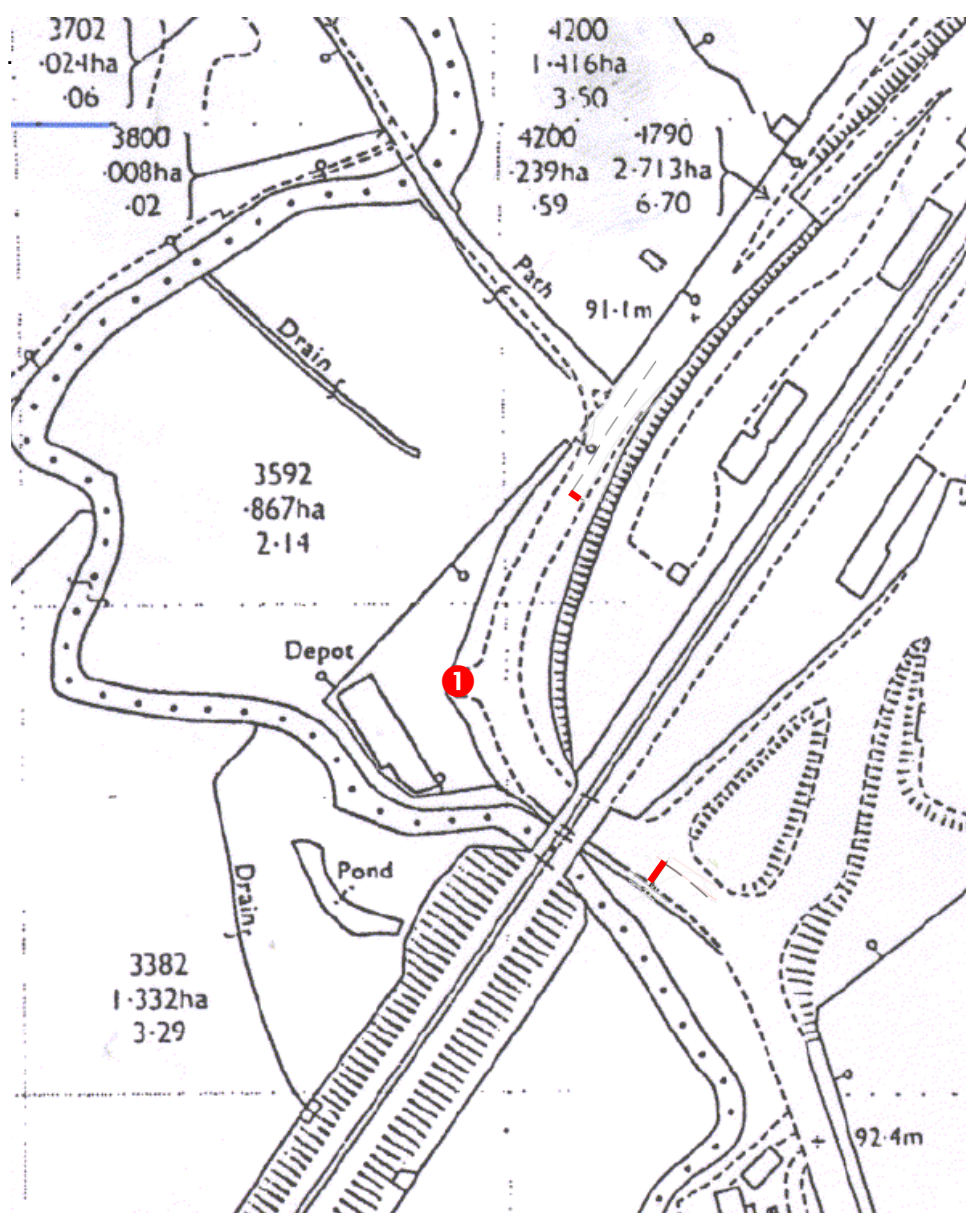


13. Appendix D – The Old Council Yard

Location Plan

The location of the entrance/exit to the vehicle repair business at the Old Council Yard adjacent to the Three Arch Bridge is marked '1' in the plan below. The business lies within the proposed zone of controlled introduced under the access scheme, but is not subject to or protected by it.

Under the proposed access scheme the carriageway on either side of the exit will be single track.



Picture 1 – Aerial Picture

The aerial picture below shows the extent of the repair businesses operation (picture courtesy Google llc)



Picture 2 – Entrance approach from the North-east



The main entrance of the repair business, as seen when approach from the North-east.

14. Appendix E – Air Quality Impact

- A 14.1. The table below presents low-end and high-end estimates of the additional vehicle emissions directly attributable to long and circuitous route presented by the proposed access scheme.
- A 14.2. Both scenarios are based on Euro 6 vehicle emission standards⁴⁸

TRANSPORT IMPACT AND AIR QUALITY CALCULATION

STATION WORKS, TISBURY SP3 6QU- APPLICATION PL/2021/09778

Additional Distance Travelled (Development Cost)						
Measure					Station Works SP3 6QU	
					Low end projection	High end projection
					<i>See Note 1</i>	<i>See Note 2</i>
Return distance Station Works to Tisbury village (km)					1.58	1.58
Number of Return Trips Vehicle Journeys per day					22	100
Additional Kilometres driven per day					34	158
Days each year					363	363
<i>Excluding Christmas Day and Boxing Day</i>						
Total Kilometres Driven per year					12,331	57,354
Additional Emissions (Development Cost)						
Emissions		Grams/Km	Emissions			
CO2 (EU Target for all new vehicles 2015+)		130	Grams:	1,603,044	7,456,020	
<i>Based on EU target of 130g CO2 per Km for new vehicles 2015 onwards</i>			Tonnes:	1.6	7.5	
NO2 (Euro 6 target)		0.06	Grams:	740	3,441	
<i>Based on EU Euro6 target of .06g NO2 per Km</i>			Kg:	0.7	3.4	
Particulate Matter (Euro 6 target())		0.005	Grams:	62	287	
<i>Based on EU Euro6 target of .005g PM per Km</i>			Kg:	0.1	0.3	

⁴⁸ Euro 6 emission levels are taken from "Explaining Road Transport Emissions – a Non-Technical Guide" published by the European Environment Agency 2016 (A10)

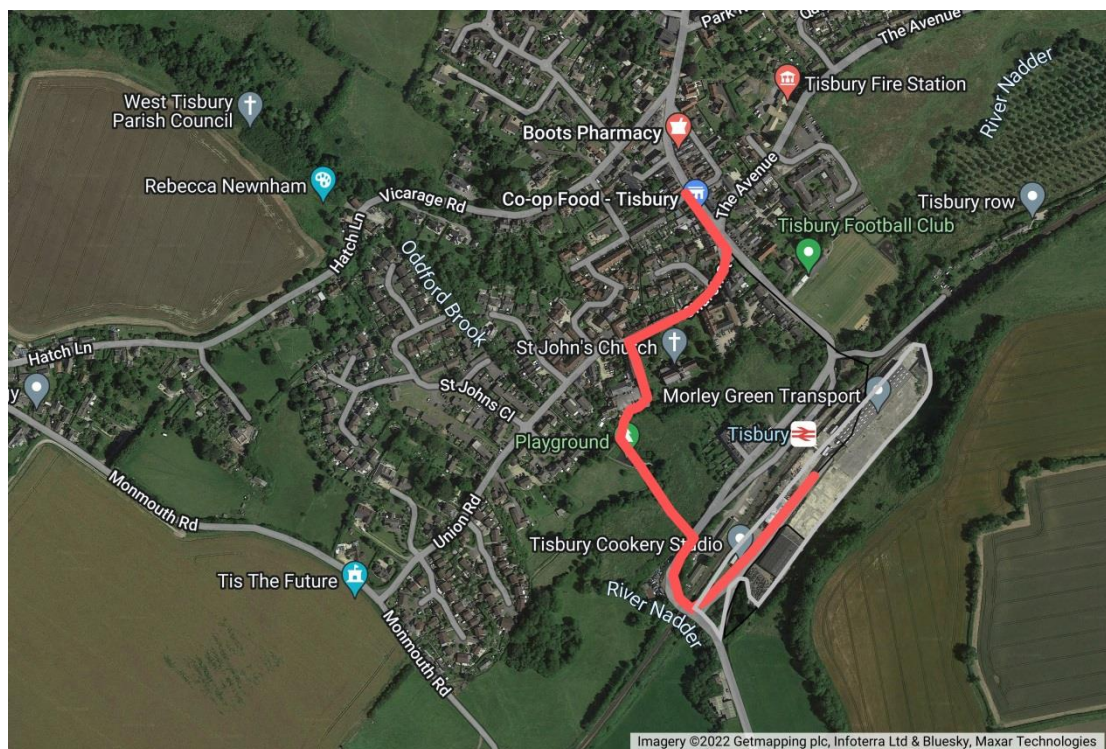
Notes to the Air Quality Table

1. Low-end Projection based on one additional car or van return trip each 4 days generated by each of the 86 proposed dwellings, which would have been made on foot or by cycle had a direct and safe route been available. No allowance made for visits to the proposed development from other parts of Tisbury village.
2. High-end Project Projection based on a total of 100 return trips to/from the proposed 86 dwellings and care home, both by occupants and visitors, which would have been made on foot or by cycle had a direct and safe route been available.

15. Appendix F – Walking Route

Route A - Proposed Walking Route

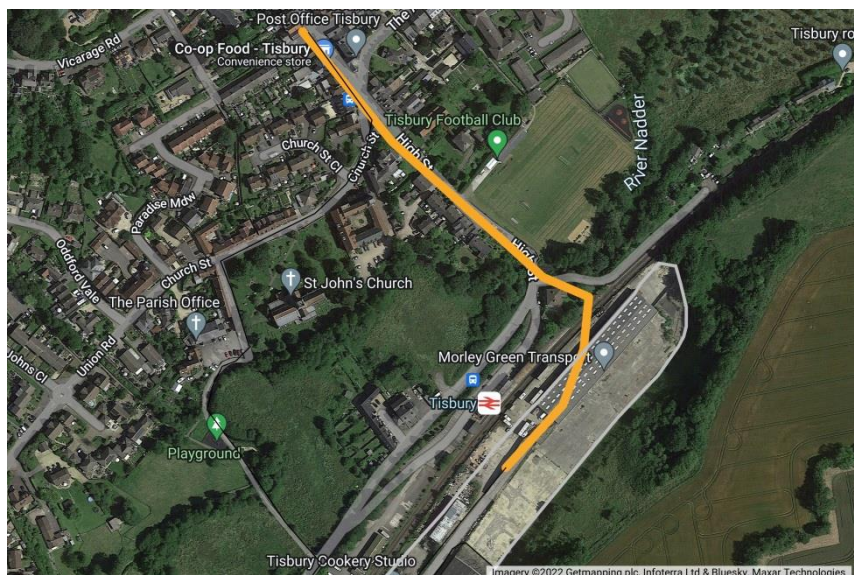
The red line on the plan below shows the proposed walking route between the centre of the Station Works site and the centre of Tisbury village (the junction of Beckett Street and High Street). The total return walking distance is 1.58km. The return walking distance from the site to the Recreation Ground by this route is also 1.58km. From the North-eastern end of the proposal site, the total return walking distance to Tisbury village is 1.9km.



Mapping, courtesy Google LLC

Route B - Direct Walking Route

The amber line on the plan below shows the direct walking route between the centre of the Station Works site and the centre of Tisbury village, achievable with provision of a direct pedestrian and cycle railway crossing, as envisaged by the Neighbourhood Plan. The total return walking distance is 856 metres. The return walking distance to the Recreation Ground by this route is 428 metres. From the North-eastern end of the proposal site, the total return walking distance to Tisbury village is 710 metres.

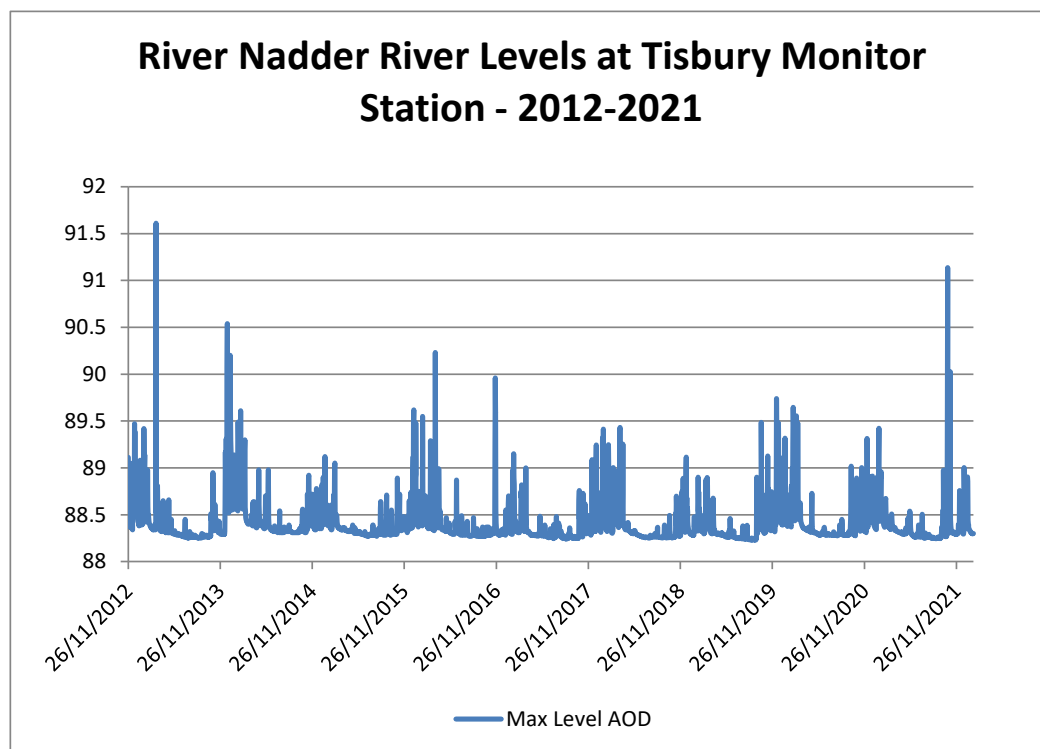


Summary

Return walking route	Route A - Proposed	Route B - Direct
Site centre to Tisbury village centre	1.58 Km	856 metres
Site centre to Tisbury Recreation Ground	1.58 Km	428 metres
North-east end of site to Tisbury village centre	1.9 Km	710 metres
North-east end of site to Tisbury Recreation Ground	1.9 Km	240 metres

16. Appendix G – Flood Levels

The chart below shows levels of the River Nadder recorded by the Environment Agency at the Tisbury Monitoring Station (near to the road bridge on Station Road).⁴⁹



⁴⁹ River level data captured by the Environment Agency and made available at [RiverLevels.co.uk](https://riverlevels.co.uk)

17. Appendix H – Lack of Contingency

The pictures below show the plated heights of the Southbound and Northbound arches of the Three Arch Bridge (10 feet 3 inches and 9 feet 9 inches respectively).

Northbound Arch (reserved for vehicles)



Southbound Arch (reserved for pedestrians and cycles)



Pictures, courtesy Google I/c

Fire Engine occupying Northbound Arch



Fire Engine occupying Southbound Arch



18. Appendix I - Flooding of the Access Route

October 2021

The pictures below show the effects of flooding at various points along the proposed pedestrian access route on 21st October, 2021



March 2016

The picture below from the Neighbourhood Plan, shows the effects of flooding at the Stubbles Footpath, in March 2016



19. Appendix J – Policy Context

The table below brings together the various statements and guidance contained in the Neighbourhood Plan showing how the provision of new access to the Station Works site needed to be integrated into a larger scheme involving both development and the enhancement of parking and rail facilities

Paragraph	Statement
Vision (page 41), repeated at paragraph 27, page 6	Investment and modernisation of the local railway network (including Tisbury Railway Station) will need to be included as part of the comprehensive development of Station Works.
Paragraph 120	Given the complexity of the site it is essential that a comprehensive approach to the development of the site is taken. Policy BL.7 needs to be coordinated with other TisPlan policies (e.g. TR.5) to ensure a strategic and comprehensive development of the Station Works site, within TisPlan's overall objectives and policies."
Paragraph 112	As this is a mixed use site, development should be phased so that employment units are brought forward during the early stages of its development, in accordance with Wiltshire Core Strategy (CP2 Delivery Strategy) and residential development should be phased to satisfy the outstanding number of dwellings required before the end of the current Core Strategy to 2026. This should ensure that development is sustainable and in line with anticipated levels of modest growth for the Neighbourhood Area to 2036.
Paragraph 113	The density and design of the development should be the product of a robust Masterplan, responding positively to the exceptional environmental quality within the wider character area within the CCWWD AONB. A comprehensive development should ensure commercial viability of the site as well as delivering the community's mandate that the site must be redeveloped.
Policy BL.7(3)	Make provision for an appropriate pedestrian access to and from the new development and the rest of the village; and show how this is to be phased, as part of the development.
Page 40	Action Points for Tisbury and West Tisbury Parish Councils to Carry Forward the Policies for Housing and Buildings BL.7 - Tisbury Parish Council to appoint a sub-committee to liaise with

Paragraph	Statement
	Wiltshire Council and any prospective developer to ensure that the Station Works site is delivered in accordance with the community's mandate
Policy TR.2	<p>Development at or within the environs of the Tisbury Railway Station that protects and enhances the existing railway service will be supported. To ensure the necessary co-ordination, proposals should be developed in conjunction with the Local Planning Authority, Network Rail and other interested parties as appropriate. Proposals should have appropriate regard for the following:</p> <ol style="list-style-type: none"> 1. Increasing and accommodating the use of public transport - train, bus and taxi. 2. Accommodating sustainable travel needs, such as pedestrian accesses, bicycle shelters and electric car charging points. 3. Extending car parking in line with the levels of station usage.
Page 52	<p>Action Points for Tisbury and West Tisbury Parish Councils to Carry Forward the Policies for Transport:</p> <p>TR.2 - Support plans for the current single line railway track to be doubled.</p>
Paragraph 116	A new pedestrian crossing at the station would facilitate access in the event of the future dualling of the track, as well as ensuring a safe and direct route into Tisbury High Street. A footbridge may not be suitable for those with mobility issues and suitable alternative access, including expansion of footpaths, could be considered as part of any development on the site. This would require negotiation with both Network Rail and Wiltshire Council Highways.
Paragraphs 117 and 118	"Development of Station Works and Tisbury Railway Station upgrades should also consider improvements to the pedestrian access by the bridge across the River Nadder into the approach to Tisbury High Street from the railway station .. an alternative may be enhancements to the footpath on Station Road and at the Three Arch Bridge, encouraging pedestrians to use the Stubbles path as a preferred route to and from the centre of the village. TisPlan recognises that the timing of the provision of upgraded infrastructure may need to be tied to the overall viability of a development scheme."
Paragraph 182	As the major brownfield employment site, a comprehensive mixed development at Station Works could provide additional employment, if sufficient land is set aside to meet the needs of existing and future businesses, in addition to providing for future housing needs in the plan area.

Paragraph	Statement
Paragraph 159	Any development should include careful plans on how best to manage road safety issues, ensuring that well-meaning ‘improvements’ do not lead to unintended, adverse consequences.
Policy BL.3	Proposals for the redevelopment of deliverable brownfield sites will be supported, subject to: <ol style="list-style-type: none">1. The character of the Cranborne Chase and West Wiltshire Downs AONB not being adversely affected,2. Policy EB.1 not being compromised, and3. There being no unacceptable impact on the local road network.
Policy TR.4	Wherever feasible, major new development should contribute to the achievement of a safe, walkable/cyclable village with integrated pathways/ cycleways connecting to its centre and amenities;

Prepared by the TisPlan Steering Group for Tisbury Parish Council

December, 2022

