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4th. February, 2010.

Ian Kemp, B.Sc. (Hons),
Programme Officer,
South Wilts. Core Strategy Examination,
36, Campbell Street,
Rugby,
Warwickshire,
CV21 2HY.

Dear Mr. Kemp,

Representor Reference: 3052

Thank you for your letter of 11th. January. My representation relates to Core Policy 2, and is essentially as set out in the Public Stage representation Form I submitted on 29th. September last. I wrote on that occasion:-

“The DPD is not justified because it is not founded on a “robust and credible evidence base”. For example, the Development Template for Land South of Netherhampton Road, Netherhampton, is based on an assumption that the existing road network can accommodate the additional traffic that the proposed development will generate. Wiltshire Council has asserted (Public Meeting, Salisbury City Hall, 3rd. September) that the Salisbury Traffic Model, supplied by W.S. Atkins at a cost of around £250,000, indicates that this is so. However, we are told the Model will not be published until December, i.e. long after the end of the current consultation. If Wiltshire Council’s assertion is correct, and they have access to results from the model, it should be ready and available for public scrutiny now. If, as Wiltshire Council maintains, it is not yet ready, they are being disingenuous in making premature assertions about the output from it. In the meantime, we are left with no idea about the assumptions underpinning the model, the data on which it operates, or how the data is processed.

In view of the above, in addition to its not being justified, the DPD is not effective, because it is not deliverable as it does not embrace “sound infrastructure delivery planning”.

The absence of a key element in the evidence cited by Wiltshire Council in support of the Core Strategy means that it is not possible at this stage to conclude that it is sound, in terms either of justification or of effectiveness. It has not been demonstrated that it is founded on a robust and credible evidence base, nor that it embraces sound infrastructure delivery planning. Following disclosure of the Salisbury Traffic Model in December, it may be possible, if there is sufficient transparency about the model’s underlying assumptions, data and operating processes, to form the opinion that the DPD is sound, but this cannot be done in the current state of publicly-available information. Following detailed scrutiny of the model, it may become clear that changes are needed to the DPD in order to make it sound.

The consultation on the DPD should therefore be reopened, and extended until at least a month after the publication of the Salisbury Traffic Model, so that the opportunity (which does not exist at the moment) is created for public comment on the basis of access to all the relevant evidence.

I wish to participate in the oral part of the examination, because issues have been raised in the DPD in respect of which adequate scrutiny of the evidence base has not been possible. The Core Strategy needs to be reviewed in the light of the output from the Salisbury Traffic Model, and on the basis of an evaluation of the validity and predictive capacity of the model. Because of the non-publication to date of the model, this cannot be done at this stage, but should be possible by the time the oral hearings take place.”

The additional evidence I wish to be considered is in respect of the continued non-publication of the Salisbury Traffic Model, despite the fact that the date previously stated for publication, i.e. December 2009, is now long past. I have reviewed the following recently published documents:-

- a) The *Options Assessment Report* (published in January),
- b) The *Briefing Note for Inspector* (published in January), and
- c) The *PD3.3 Forecast Report* (published in December),

which, despite frequent references to the Model output, still do not tell us what assumptions underpin the Model, what data has been fed into it, or how those data are processed. Without this information, it is not possible to give the Model projections the critical appraisal that is necessary before its predictions can be given credence. You will note from the above that I have already indicated that I wish to part in the appropriate oral hearing.

Yours sincerely,

Professor Derek Pheby.