

WILTSHIRE COUNCIL

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PUBLIC PARTICIPATION – ITEM 7: WILTSHIRE CORE STRATEGY

STATEMENT FROM SOUTH WILTSHIRE ASSOCIATION OF COUNCIL TAX PAYERS

SALISBURY CONTINGENCY PLAN – POLLUTION 2024

A Sound, Sensible and Essential Decision

INTRODUCTION

The South Wiltshire Core Strategy (SWCS) was examined by the Government Inspector prior to the publication of the Localism Bill 2011, and the National Planning Policy Framework (NPPF), published 27 March 2012. A challenge through the High Court on decisions already taken would have failed as the Planning changes in the NPPF were needed to solve the problem of Salisbury pollution.

However, it is now essential to understand and accept that paragraph 182 of the NPPF directs that, in order to be 'sound', local plans must be consistent with national policy and in accordance with the policies in this Framework. Further to this, paragraph, 213 states that, 'Plans may, therefore, need to be revised to take account of the policies in this Framework. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan.'

MAJOR PROBLEM IDENTIFIED

A major problem has now been identified within the SWCS that could have a significant effect on the future health problems for the citizens of Salisbury. And in this context, it is important to quote from the NPPF Ministerial foreword, written by the Rt Hon Greg Clark MP, Minister for Planning.

His opening remarks in the NPPF document include the following:

"The purpose of planning is to help achieve sustainable development"

["Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations."](#)

This second remark is crucial for the future protection of the health of the citizens of Salisbury and this document will clarify the reasons why, and offer a new opportunity for the introduction of measures to implement the necessary protection required.

THE TWO RECENT INQUIRIES

At the two recent Inquiries into 'Hampton Park' (HP), and the SWCS, substantial evidence, [A Refined Core Strategy \(RCS\)](#), was presented by the Royal Society Environmental Working Group (RSEWG).

This contained the importance of pollution control for the City of Salisbury. However, neither Inspector included any of this evidence in their Reports for the consideration by the Secretary of State (S of S). Both inspectors focused their attention on the timescale 2012 to 2026, which they identified as the implementation period for the SWCS.

Unfortunately, because the NPPF had not been published by October 2011, the SWCS inspector included at paragraph 28 of his Report that, 'As to the National Planning Policy Framework, this is a draft document which is still undergoing consultation and thus may alter. Little weight can, therefore, be given to it.'

However, it is interesting to note that in August 2011 the inspector called for witnesses appearing at the Inquiry to present their comments on the draft NPPF.

The inspector was specifically requested to take note and consider the effects of the SWCS planning for housing development after the time of 2026, but as already explained he was only concerned for the period from 2012 to 2026. The NPPF now changes this closed time concept.

NEW COMPLIANCE ESSENTIAL

Whilst the SWCS requirement for 9910 houses is fully supported by the RSEWG, and they certainly need to be built soonest, it is now essential that compliance with the important statement at paragraph 13 of the NPPF is fully accepted by local councils. The statement records, 'The NPPF constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.'

And the relevant Note to the above statement says, 'A list of documents revoked and replaced by this Framework is at Annex 3. Section 19 (2)(a) of the Planning Compulsory Purchase Act 2004 which states, in relation to plan-making, the local planning authority must have regard to national policies and advice contained in guidance issued by the Secretary of state.'

So, it should now be accepted that whilst the comments made by the two inspectors in their 2011 Reports were justified at that time, the guidance by the S of S contained within the NPPF now opens the opportunity for the examination where necessary of particular elements within the SWCS. Again it is repeated that, 'Plans may, therefore, need to be revised to take into account the policies in this Framework', that is the NPPF.

PARTIAL REVIEW NOW NEEDED

An urgent request is now presented for a 'partial review' of the SWCS in respect of the decision to construct a housing development on the area known as Hampton Park (HP). Furthermore, because it is understood that the Local council will be called to vote on the implementation of the SWCS within the next four weeks the review decision is now very urgent. Moreover, whilst the S of S has previously made a decision to support the housing construction at HP, this application now contains information not included by the Inspectors in their Reports for consideration by the S of S.

SALISBURY TRAFFIC POLLUTION

The city of Salisbury has a growing problem of traffic and a number of AQMAs to monitor pollution are located in and around the area. Traffic pollution is certainly dangerous for the very young and the elderly.

MEDICAL EFFECTS OF AIR POLLUTION

A recent Report produced by the Committee on the Medical Effects of Air Pollution, COMEAP, states that Findings confirm that outdoor air pollution at current levels make a significant contribution to mortality in the UK today, in terms of total population survival time, which has been estimated separately as a greater burden than the mortality impacts of environmental tobacco smoke and road traffic accidents. Correspondingly, reductions in population exposure to air pollution, expressed as an average PM₂₅, can have appreciable benefits in terms of reduced death rates and the associated increase in life expectancy and in terms of the total years lived by the population as a whole.

SALISBURY ROADS AND PARKING

Salisbury has nine major A roads leading towards the city, and a major A road running east to west through it. Whilst much work was carried out on plans to remove the heavy growing volume of traffic with a bypass, it was eventually decided to produce a Park and Ride (P & R) system instead of a bypass. However, whilst the P & R has certainly contributed to a reduction in those city workers who drive and park in the city centre car parks, the P & R has produced no reduction in the huge volume of traffic that passes through the city every day. Moreover, with the national forecast of traffic growth, the pollution within the city could eventually increase to high and unacceptable levels.

SALISBURY TRANSPORT MODEL

As was required for the SWCS, a Salisbury Transport Strategy (STS) computer Model was produced at a cost of £250,000. The Model produced an 'Emissions Analysis of local air quality'. It forecast that technology, traffic changes in volumes and speeds between 2008 and 2026, will result in changes in emissions of local air pollutants in the AQMAs.

The Model produced a forecast reduction of minus 30% of NO_x and minus 26% PM₁₀ pollutants by 2026. This was presented for public examination at the SWCS Inquiry.

UN SOUND TRAFFIC MODEL

Examination of the computer Model and its forecast data was undertaken by Professor D. F. H. Pheby, B.Sc., MB, M.Phil, LL.M, MRCS, LRCP, DOBstRCOG, FFPH., from the RSEWG. He produced a very detailed and clear Report.

The Report Conclusion said that, 'while the Model is a useful tool for generating a Transport Strategy, it does not in itself constitute such a strategy. Its utility is restricted by data errors and omissions, and some rather dubious approaches to data simulation. It requires a more intensive and wide-ranging approach to data collection, fewer data errors, more intensive validation procedures and detailed sensitivity analyses. The presentation of outcomes to 2026 should be in the form of a range rather than a single figure, which would be automatically generated if confidence intervals

were calculated for input data, particularly those augmented by means of simulation. Without these changes, and as it stands, the Transport Model does not provide reassurance that the infrastructure will be able to cope with the increased demands upon it likely to be generated by the implementation of the SWCS.'

The above was only the conclusion, whereas the full document consists of six full A4 pages of examination in detail.

THE INSPECTORS FINDING

In the Inquiry Inspectors Report at paragraph 153, he records that, 'there is an element of uncertainty attached to the predictions of any model and it would have been possible for the findings of this model to be given as a range of outcomes. However, there is nothing to suggest that this would have significantly altered the model's forecasts.'

It is firmly believed that had professor Pheby's Full Report been included as an appendix by the Inspector, the S o S would also have been rightly concerned that the Transport Model did not support the SWCS, and that a major re-build of the Model was essential in order for the SWCS to be classified and accepted as being 'sound'.

IMPORTANCE OF HAMPTON PARK FOR SALISBURY POLLUTION

But what effect has this information on the plan to construct housing on the land at HP ?.

Although informed in detail at the Inquiry, the inspector did not include in his findings that the HP area was critical and the only land now remaining available on the outskirts of the city, where should a bypass be necessary at some future date, it could be constructed for the removal of traffic from the city, this information was especially relevant for the future after 2026, and the Inspector was asked to take this into account. If the Refined Core Strategy (RCS), presented by the RSEWG had been included or even summarised within the Inspectors Report, the S of S would have immediately seen that the recommendations included actually fell very much in-line with many of the guidelines he has produced in the NPPF. Furthermore, the Inspector commented in his Report that funding was not included by the council for any road construction, but as the recommendations within the RCS did not call for such funding, it was made clear that HP ground area needs to be held in reserve should the need arise at some future date past 2026, when funding could well be available. A bypass cannot be constructed on the southern side of the city because of water problems.

It is important for the S of S to know that the land at HP had been marked as a reserve area for a potential northern bypass for the city for a number of years, and was only removed as such when it was decided to introduce a P & R system.

CRUCIAL DECISION ON HOUSE BUILDING

Returning to the Ministerial foreword by the Planning Minister, there now seems to be little doubt that his statement, - *Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations*, - is crucial in respect of the decision to not allow house building on HP

at the present time. The health of the citizens of Salisbury needs to be protected by the removal of heavy and growing traffic from the major route passing through the city.

SOLUTION ONE - FOR HAMPTON PARK

In his Report, the Inspector made it absolutely clear that all of the nine areas originally selected for potential house building now remain suitable. Moreover, with the total housing numbers at a previous figure of 12400, the new requirement now being down to 9910, there remain plenty of suitable areas to re-site the housing from HP. This could certainly be achieved as a priority if necessary and at an early time.

SOLUTION TWO - FOR HAMPTON PARK

However, should there be a particular problem not already foreseen, an alternative to the full removal of housing from HP could be as follows:

The traffic Model referred to earlier, estimates in its findings that, 'the predicted changes in vehicle technology will significantly reduce emissions produced per kilometre, and thus remove pollution during the next fourteen years to an acceptable level of air quality.

This is an estimate from an 'unsound Model', and no account appears to have been taken of the current financial climate and its effect on the public as regards the possible high costs required by the public for the purchase such items as electric type cars that might produce a significant reduction in emissions.

So, if for some reason housing must be built on HP it is very strongly recommended that:

DELAY PLANNING APPLICATION SUBMISSION TO 2024

No planning application should be acceptable by the council for house construction on HP until 2024. By this time it will be evidently clear as to whether the Model forecast of a major reduction in pollution is correct and that pollution has been largely removed from the city of Salisbury.

COUNCIL RETAINS CONTROL FOR POLLUTION PROBLEM

But if pollution levels are not reduced by 2026 as estimated by the Model, then a future council will still have the opportunity to provide protection for future generations of Salisbury citizens, by the use of HP area for the removal of polluting traffic from the city. It is noted that a suitable and significant length of single roadway (Pearce Way) was constructed several years ago, as a part construction for a bypass and remains available.

HAMPTON PARK HOUSING CURRENTLY NOT SUSTAINABLE

Sustainable means ensuring that better lives for ourselves don't mean worse lives for future generations, and as planning estimates stand at this moment in time, the construction of a large housing complex on the Hampton Park area is ***NOT SUSTAINABLE.***

With no guarantee of pollution removal by the Model estimate for 2026, there remains the real possibility that there could be a major pollution problem within the city that would worsen the lives of future generations. This important reason must now be accepted by the Council.

LOCAL PEOPLE TO SHAPE THEIR FUTURE

Finally, the National Planning Policy Framework clarifies at paragraph 17, under 'Core Planning Principles' that:

“Planning should be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.”

The Secretary of State is asked to accept that his introduction of the new, comprehensive and clear National Planning Policy Framework has now altered the acceptable planning requirement for a critical area of land at Hampton Park.

The Secretary of State is requested to advise Wiltshire Council that, taking into account the National Planning Policy Framework now effective, it is considered to be in the best interests of the citizens of Salisbury that one of the two options tabled in this document is now implemented. This action offers a real opportunity to afford the necessary protection for the health of the present generation, and yet meet the requirements of sustainability, as explained by the new planning requirements in affording long term health protection for a future generation.