

Regional Spatial Strategy for the South West 2006-2026 Consultation

Response of West Wiltshire District Council

November 2004

Summary

West Wiltshire District Council has considered the consultation report "Possible Development Strategies for the Region" and raises the following concerns:

- *There is uncertainty regarding overall levels of growth and the capacity of the Principal Urban Areas to accommodate these levels;*
- *The options provide little scope for market town regeneration and meeting local needs. Specifically, they will not meet the current regional, county and local objectives for self-containment in the western Wiltshire towns, regeneration of the western Wiltshire towns, promotion of employment opportunities, improvement of transport links in the A350 corridor and meeting housing needs;*
- *There is too much emphasis on meeting housing growth - and not enough on meeting the needs of the regional economy;*
- *The strategy options are too urban in focus - there is little discussion of the challenges facing rural areas;*
- *In rural areas there is a need for flexibility - to provide opportunities for rural economic growth;*
- *The strategy options are too "top down" with little flexibility for local input through Local Community Strategies;*
- *The methodology and evidence basis for the 3 options approach should be more explicit and published for consultation.*
- *There is a need for alternative options which provide some flexibility below PUA level and recognise the contribution that "clusters" of industrial/market towns such as those in western Wiltshire / north Somerset can make.*

Uncertainty regarding overall levels of growth and the capacity of the Principal Urban Areas

The consultation report is focused upon the spatial strategies for the distribution of growth (in particular housing). However, there remains uncertainty on the likely overall levels of growth to be accommodated within the region. For example, whilst the current RPG10 plans for 20,000 net new dwellings per annum, the latest ONS projected households data estimates a need for 22,600 per annum. In addition, the Government commissioned Barker report has recommended a substantial increase in national house building rates to meet perceived needs. However, the Government has yet to determine its response to this report and there is uncertainty as to the implications for the South West region. It is noted that for the purposes of the sub regional studies of the large urban areas, the Regional Assembly is testing housing figures up to 30,000 per annum.

There is little discussion of economic growth projections and the spatial implications of sector growth and decline.

Joint studies are currently being undertaken into the capacity of the Principal Urban Areas (PUA's) including Swindon and the West of England (Bristol/Bath/Weston). The results of these studies will not be available until after this consultation process.

The overall level of growth and the capacity of the PUA's are important matters because these factors could determine the success or failure of the strategy options. They could also determine the scale of development which smaller (market) towns may be asked to accommodate. Consultants have also concluded that a high level of growth could make a potential new town strategy option more attractive.

West Wiltshire District Council therefore believes that it is essential for a proper consideration of the strategy options that there should be further consultation on a fuller range of strategy options taking account of possible alternative levels of growth for the region as a whole and taking account of the results of the PUA studies.

At the conference in Weston, the Regional Assembly spokesperson suggested that a further period of consultation could be undertaken during spring/summer 2005 following the sub regional study results to finalise the preferred option. The District Council would support this approach.

Little scope for market town regeneration and meeting local needs

Options 1 and 2 propose the concentration of growth in the PUA's and other designated centres for growth, with market towns and rural areas meeting undefined "local needs" only. Option 3 would appear to allow for some growth at smaller towns. However, clarification of this option at a recent regional conference has determined that any flexibility will be on a sub-regional basis, with the emphasis for the northern region (i.e. the majority of West Wiltshire) continuing to be on the three PUA "clusters" (i.e. the Swindon PUA for Wiltshire).

The 3 options therefore provide little or no scope for growth in West Wiltshire in order to continue to meet the current regional, county and local objectives which are:

- Self-containment in the western Wiltshire towns;
 - Regeneration of the western Wiltshire towns;
 - Promotion of employment opportunities;
 - Improvement of transport links in the A350 corridor;
 - Meeting housing needs.
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- Self-containment in the western Wiltshire towns

The western Wiltshire towns consist of a cluster of medium sized and small towns located relatively close to the Principal Urban Areas (PUA's) of Bath, Bristol and Swindon. There is a complex pattern of in-commuting and out-commuting between these towns together with out-commuting to the PUA's.

Current regional, county and local strategies are to promote economic regeneration and restructuring within the western Wiltshire towns to provide local jobs for local people. Local jobs will decrease out-commuting to the PUA's and help to reverse the trend towards the creation of dormitory towns.

The very proximity of these towns to the PUA's means that there needs to be priority given to making these towns more self-contained, by providing opportunities for employment. Out-commuting is the cause of congestion and major air quality issues in Bradford on Avon and Westbury.

West Wiltshire District Council does not consider that any of the options will deliver the objectives of greater self containment in the western Wiltshire towns. The focus of employment growth at the PUA's will help to exacerbate out-commuting from West Wiltshire.

- Regeneration of the western Wiltshire towns and the promotion of employment opportunities

Historically, the western Wiltshire towns have formed the industrial heartland of Wiltshire. In spite of major losses in the industrial sectors, restructuring of the economy has been relatively successful over the last 10 years. Indigenous industries have relocated to better, more modern premises (Avon) and new industries have been attracted (Virgin, Westinghouse). There is currently no significant unemployment issue in West Wiltshire but West Wiltshire District Council believes that all agencies need to continue to work actively to secure this position.

Echoing the Wiltshire economy, the West Wiltshire economy is vulnerable to change in future years with the continued decline in traditional manufacturing and agriculture with banking and finance showing a slight decline up to 2016. Food, drink & tobacco manufacturing sector also likely to experience some decline in employment.

One of the features of West Wiltshire's economy is the continued high concentration of traditional manufacturing in the District with its reliance on the rubber and plastics manufacturing sector as well as food & drink manufacturing. These labour intensive operations are more likely to see a decline in employment but companies investing in research & development (R&D) facilities should continue to see a rise in productivity.

A significant population growth of 9% was recorded between 1999-2001, in addition West Wiltshire is projected to grow in employment terms by 8.2% (*Source: Vision for Trowbridge Economic Impact Study, 2004*).

This projected growth and these sector changes will stimulate demand for new property requirements. If we are to support the sustainable development of the local economy there is a need to provide quality sites for firms wishing to expand or relocate from older premises particularly if investment in R&D is to be encouraged. Existing industrial estates are unlikely to fulfil these requirements and there is therefore a need for the development and expansion of high quality business parks/technology parks.

The availability of employment land to create high quality business parks and technology parks is a key issue with commercial agents suggesting that there is a shortage of 'readily available sites' for development. The lack of land is constraining speculative development.

There is therefore a future need for the identification of further employment opportunities to allow inward investment and the relocation of indigenous industries to achieve a restructured and modern employment sector.

The proposed options appear to provide little or no opportunity for future economic growth within western Wiltshire. The cluster of western Wiltshire industrial towns does not "fit" within the framework provided by Principal Urban Areas (Bristol / Bath / Swindon), other designated centres of growth outside the influence of PUA's (Salisbury) or smaller towns and key centres in rural areas where development will be for "local needs" only.

- Improvement of transport links in the A350 corridor;

The Western Wiltshire Sustainable Transport Strategy (WWSTS) has sought to strengthen western Wiltshire's economic base by improving accessibility along the north-south axis of the A350 transport corridor between Junction 17 of the M4 and Warminster. This has enabled inward investment and a re-structuring of the areas economic base. As a consequence, increased accessibility to local employment provides choice and an alternative to out-commuting to neighbouring PUAs.

By concentrating future growth upon the PUAs, the strategy options will weaken the area's economic base. Consequently, the length and number of trips generated within the area is likely to increase due to the demand for out-commuting to the PUAs.

West Wiltshire District Council believes that the Regional Strategy should be providing for local, self-sustaining, growth within western Wiltshire. Transport improvements to the A350 should be supported as a priority, to improve access to employment sites and to allow environmental improvements to towns where air quality has become a problem.

- Meeting housing needs

There is a high level of housing need in West Wiltshire. The West Wiltshire Housing Needs Survey (2001) and Update (2003) demonstrate that there is a growing backlog of need for affordable accommodation in West Wiltshire. In 2001, the total backlog totalled 520 households, and this had increased by 2003 to 593 households.

Although, in theory, the strategy options provide for areas outside of PUA's, such as West Wiltshire, to meet some element of "local need", in practice this is unlikely to be achieved without some element of growth. With the withdrawal of refunded Local Authority Social Housing Grant, it is increasingly unlikely that Shire authorities will be able to fund affordable housing or other local needs housing directly without relying on its provision as a proportion of general market housing growth. The Regional Assembly has not identified the essential delivery mechanisms for meeting local needs through a non-market approach.

It is a fundamental aim of national policy for the planning service to help to deliver mixed and balanced communities. The option 2 "affordable housing only" approach to new housing outside PUA's and other designated centres of growth will not achieve this objective.

A number of other concerns have been raised at regional and sub-regional conferences

West Wiltshire District Council recognises a number of other concerns raised during the consultation process and requests that these should be addressed by the Regional Assembly:

- There is too much emphasis on meeting housing growth - and not enough on meeting the needs of the regional economy - which is the key sustainability driver;
- The strategy options are too urban in focus - there is little discussion of the challenges facing rural areas, which are seen purely as the areas between the PUA's;
- In rural areas there is a need for flexibility - to provide opportunities for rural economic growth, and in particular to provide opportunities for farm diversification in the aftermath of the forthcoming CAP reforms;
- The strategy options are too "top down" with little flexibility for local input through Local Community Strategies;
- The methodology and evidence basis for the 3 options approach should be more explicit and published for consultation.

A need for alternative options

The 3 consultation options propose the same basic approach to achieving the sustainable development principles set out in the Integrated Regional Strategy. All propose the concentration of development at the PUA's and other designated centres of growth with only local needs met elsewhere.

West Wiltshire District Council considers that this is too simplistic a view of the options for achieving sustainable development. The role of "clusters" of industrial towns is not recognised, nor is the potential for a new settlement in the South West examined. Inequalities within the region are only recognised on a broad south west - north east sub-regional basis.

West Wiltshire District Council considers that further options should be developed, which provide some flexibility below PUA level, for a differential approach based upon an analysis of the form and function of settlements across the region and a recognition of the contribution that "clusters" of industrial/market towns such as those in western Wiltshire / north Somerset can make.