

**Matter 2 Consistency with the Wiltshire Core Strategy**

**Issue 2 Does the WHSAP make adequate provision to meet housing requirements as set out in the WCS?**

2.1 to 2.5 The most appropriate scale is that where the provision can be assimilated into, and economically contribute to, whichever category of settlement is selected. In the case of County level this is driven by what the HMA assessment forecasts. In this lies a strange anomaly. The HMAs shown on the Map of the Community Areas and Housing Market Areas, (3 in number) of the WHSA Pre-sub Topic Paper 3 page 15, are not the same as those shown in the Swindon and Wiltshire Joint Spatial Framework Market Areas Profile papers of November 2017. (See those for Chippenham and Trowbridge) (The Figure 2.1 Housing Market Areas on page 11 of the July 2018 submission version does not name the settlements) This opens the question about the extent to which under delivery, and over allocation to compensate, has a knock on negative effect at settlement level far from the source of failure. Particularly the negative effect on market towns and some large villages which do not have the financial capacity to improve their road or urban infrastructure, and are seeing almost no employment growth.

The residual level of development at Trowbridge, which now faces allocations of over a thousand further homes, will be met with time but the added pressure from the many extra sites to the road linkages is not assessed in the round. The FEMAA (Functional Economic Market Area) assessment of 2017, on which much of this housing growth is premised, is driven by the economic strategies of the SWLEP and the funding which follows them. The FEMAA assessment for the Trowbridge HMA (which forms part of the huge North and West Wiltshire Community Area HMA) shows on the one hand an oversupply of workers in the HMA 2016-36 and on the other hand the increasing pressure from the A350 Growth Zone (SWLEP). The logical conclusion is that this increases out-commuting. Core Policy 1, the Settlement Strategy, maintains that there will be significant levels of jobs and homes with the infrastructure to meet economic potential in **the most sustainable way to support better self-containment**. It also states the Market Towns have the potential for significant development that will increase the **jobs** and homes in each town to help better levels of self containment and viable sustainable communities.

2.5 The predicted delivery of the allocated sites would be impossible to anticipate. Once Ashton Park and West Ashton Road start delivering the danger will be for the small sites (listed in the sites allocations) being swamped by large numbers on the new estates and for the bigger sites to start and then slow down. To avoid an already flooded market for 4 bed commuter family homes, the larger developers will slow down the build rates (as is currently the case in more than one market town)

The Trowbridge JSF makes it clear, (Nov 2017) that, contrary to the aim of the Core Strategy Vision, CP1 and CP2, that "significant growth in employment provision will have taken place at Trowbridge helping to strengthen the town's strategic employment role and will consist of town centre and edge of centre development." that there will be a decline in B2 general industrial sector in the town and growth will be B1 and B8. At the same time it states suggests there will be an over supply of workers relative to jobs for 2016-36.

Is the town sufficiently attractive to inward investment to support its current role (and increased housing) to continue as a main focus for growth in Wiltshire, and to justify further housing without secured employment?

**Issue 3 Does the distribution of site allocations accord with the spatial strategy of the WECS.**

The spatial strategy CP1 and CP2 has been bypassed during the past 5 years by the emergence of the power of the SWLEP to dictate where development patterns should take place and the failure of the Council to force developers into commencement of sites within three years. The overall distribution of housing allocations is almost entirely centred on the A350 Growth corridor. The Market towns, and large villages have suffered damagingly high growth by Appeal, leading to a number of them becoming commuter towns with no hope of local economic growth, thus creating communities who have not benefited from rising self-containment or viable sustainability, merely increased housing.

This is the malign effect that the focussed growth of Chippenham and Trowbridge (and the failure to deliver the anticipated numbers) has had on North and West Wiltshire Housing Market Area and towns such as Corsham, Calne, Wootton Bassett, Melksham, Bradford on Avon.

The footnotes to Table 4.44 in the draft Wiltshire Housing Site Allocations Plan show that this has fundamentally undermined the spatial strategy.

This HMA is far too big and when failure to deliver at Trowbridge could see speculative applications in the over developed market towns (above) then the strategic objectives and policies are worthless.

The market town profiles of North Wiltshire, their landscape, working/shopping patterns are very different to those of Warminster, Trowbridge or Chippenham, and are being eroded.

3.4 There should be no compensation for shortfalls in provision within particular settlements through development in other locations. The "other locations" in the North and West HMA are saturated and employment growth flat lining except in exceptional circumstances such as Hullavington with Dyson.

**Issue 4 Has the site selection process for housing allocations been soundly based.**

4.6 The cumulative transport infrastructure requirements of the allocated sites, accumulated through addition to existing allocations, should be assessed with the view that car commuting must be reduced (therefore the opportunities for alternatives must pre-exist)