WILTSHIRE LOCAL PLAN CONSULTATION

Appendix 1 to CPRE Wiltshire's Response - Housing Need and Supply Assessment for Wiltshire CPRE

Gerald Kells

February 2021

1. Background

1. I was asked to review the basis for the housing numbers presented in the Wiltshire Plan Consultation to inform the response by Wiltshire CPRE.

2. I have considered the broad evidence informing the plan, including the 2017 Strategic Housing Market Assessment (SHMA)[1], Functional Economic Market Assessment (FEMA)[2], Strategic Housing Land Assessment (SHELAA)[3] as well as the updated Local Housing Need Assessment (LHNA)[4] and the Housing Land Supply Supplement (HLSS) 2019[5].

3. I have some significant concerns about the evidence base, which I found confusing and with important gaps, which made it difficult to interpret. CPRE may wish to discuss with the Council improvements to the evidence base including:

a. up-to-date estimated yields for sites the council is consulting on
b. clarity on the assumptions about density
c. a breakdown of the supply figures for each local and market area (using tables that match the delineation in the emerging plan) showing clearly how the 'residual' element of the plan is derived.
d. up-to-date data on windfall completions split between small and large sites in each market area.

[1] Swindon and Wiltshire Strategic Housing Market Assessment (SHMA) Report 2017 | Swindon Borough Council
[2] Microsoft Word - Final Draft Report v1.0 - Swindon and Wiltshire Functional Economic Market Area Assessment.docx
[3] Monitoring and Evidence - Wiltshire Council
[4] Swindon_Wilts_Local_Housing_Needs_Assessment_April_2019.pdf (wiltshire.gov.uk)
[5] Appendix 5 (wiltshire.gov.uk)

4. I was not asked to come to a view on the distribution of housing or on specific sites. This report, therefore, does not consider whether any single location is correct but whether the overall numbers and approach should be supported.

5. My conclusion is that using an estimate of housing need based on the Standard Methodology with a modest allowance for windfalls should be adopted which would reduce the overall need for housing.

6. I have not considered the distribution of residual housing need in detail, but this would allow CPRE to identify the most sustainable locations and to oppose over-provision elsewhere.

7. The Report is in three parts. The first deals with the overall Housing Need calculation, the second with the level of expected Windfall Provision and the third with the approach to Supply.

2. Housing Need

8. The Plan sets out two figures for the Housing Need in Wiltshire. The first is the output from the Government's Standard Methodology, 2042 dwellings per annum (dpa) or 40,840 homes between 2016 and 2036, the second is a figure of 45,630 both derived from the Local Housing Need Assessment (LHNA). The increase is entirely based on assumptions about the balance between jobs and workforce and is derived from the earlier FEMA.

9. The Government also consulted in 2020 on a new Standard Methodology which would have increased the housing need in Wiltshire but it was shelved in favour of retaining the current SM with an uplift to the twenty largest towns and cities in the country with the aim of increasing urban brownfield development. This did not include Wiltshire or neighbouring Swindon.

10. In their published response on 16 Dec 2020[6] the Government stressed the importance of brownfield development and directing development to urban regeneration sites, as well as the potential for larger scale changes to town centres, reflecting the acceleration of structural change to retail, leisure and other urban uses following the COVID pandemic.

Standard Methodology

11. The standard methodology calculation for a plan based on the ONS 2014 housing projections and the latest 2019 affordability rates for Wiltshire is 2006 dpa or 40,120 homes. It should be noted that the figure of 2042 given in the LHNA assessment and in the plan is slightly higher because it uses the 2018 affordability rates. Because of the

[6] Government response to the local housing need proposals in "Changes to the current planning system" - GOV.UK (www.gov.uk)

high prices in Wiltshire this is considerably higher than the base-line demographic need of 1484, so represents a considerable additional housing provision.

12. The Government continues to support the 2014 figures although both the ONS2016 and ONS2018 figures would produce lower national targets. Some authorities have adopted the 2016 figure where it is higher. In the case of Wiltshire, it would amount of 2094. However, when Swindon and Wiltshire are considered together the overall need goes down from 3036 to 2905.

13. The ONS2018 figures are similar nationally to the ONS2016 but because of a shortened period for the calculation of Internal Migration (due to changes in how the NHS monitor movement) they produce higher figures in some areas, which may be influenced by short term factors. In the case of Wiltshire, the figure is 2138.

14. Neither figure would equate to the LHNA calculation, and in terms of the more realistic ONS2016 figures, the result of adopting them would be to direct housing away from Swindon into Wiltshire which would not seem to support the Government's intentions of prioritising urban regeneration or directing development towards the most sustainable locations.

15. The standard methodology superseded the approach taken in the 2017 SHMA, which started with the ONS2012 housing projections and then included a series of additional factors, set out in Figure 69 of the SHMA, such as transitional vacancies and concealed households, as well as adjustments for market signals and balancing jobs. Such an approach has always risked double-counting housing need. It was also already out of date since the ONS2014 figures showed lower household growth in both Swindon and Wiltshire as shown in Figure 32 of the SHMA.

16. I, therefore consider that the figure of 2006 dpa (40120 over the plan period) represents a robust supply figure for Wiltshire.

Local Housing Needs Assessment

17. The LHNA gives an overall figure of 45,630 dwellings, (2281.5 dpa). In reaching this figure it relies entirely on an assessment of the balance between jobs and workers. This is justified by reference to the PPG on Housing and Economic Need[7]. It does not appear that any of the three examples given, a particular growth strategy, additional infrastructure or duty to cooperate, are being called upon.

18. However, while the NPPG could be interpreted more widely than those examples, the case for this higher number in Wiltshire is not based on a specifically identified need and seems to require a somewhat complex process which I am not convinced of.

19. It starts with a requirement figure of 22,389 workers to provide for 'main' jobs. In fact, the FEMA gives a range between 18,800 and 29,900 for Wiltshire, (Fig 5.2) the

[7] Housing and economic needs assessment - GOV.UK (www.gov.uk)

former being the Oxford Economics figure and the later the Cambridge Econometrics figure for Employment Growth.

20. 5.3.3. of the FEMA assumes an in-commuting rate of 14%. This would leave 16,168 OE or 25,714 CE (20,941 if the simple average of the two were taken). The LHNA figure is, therefore, somewhere between the two projections. There is, however, in my view a number of problems with this approach.

21. The first obvious issue is that the Oxford Economic figures may be lower simply because it puts constraints on job growth resulting from demographic migration patterns included within the model, which are different from the approach of the Cambridge model which allows for less-constrained growth.

22. It is noteworthy that other authorities have relied entirely on the Oxford Economic figures to assess economic need (for example the Leicestershire Housing and Economic Development Needs Assessment undertaken by GL Hearn.)[8]

23. They themselves are cautious about the use of such figures to increase the housing requirement. As they say at 5.3 of their report:

Clearly it would be illogical for an area to increase population growth above the levels shown in trend-based demographic projections (and hence increase housing need) through increased in-migration without consideration of the impact this would have on other locations (where an increase in out-migration might be expected). Economic evidence therefore needs to be treated with a degree of caution, and a recognition that ultimately economic factors are a potential influence on the distribution of development in particular.

24. There is also a potential circularity to the Council's approach, where the assumed increase in jobs increases the housing need which then increases the employment need.

25. This issue is one which Councils were warned about in the Planning Advisory Services' technical advice note on: Objectively Assessed Need and Housing Targets of 2015[9], even before the Standard Methodology was introduced.

26. Referring to the approach of relying on separate economic modelling 8.10 of the advice note quotes Oxford Economics, who provided one of the economic models for the FEMA. The note says, pertinently:

Whether the calculation is merely circular, or logically inconsistent as shown in the graphic, it cannot produce a valid result, because its logic is faulty. One of the main UK forecasters [Oxford Economics], warns of this problem in its local forecasts method statement:

[8] Housing and Economic Development Needs Assessment (HEDNA) -Strategic Growth Plan LCC (llstrategicgrowthplan.org.uk)
[9] objectively-assessed-need-9fb.pdf (local.gov.uk)

'The population and employment forecasts are inter-linked, thus if more people are attracted into an area this will have implications for the employment forecasts via demand for local services (education, healthcare, retailing, leisure etc.). It is a little more complicated than this as developments in one local area affect another, so the models have to solve this simultaneously.

Therefore, forecasts from other sources, including alternative population forecasts, should not be set alongside those produced by Oxford Economics' Local Authority District Forecasting Model as they will not be consistent given linkages within the Oxford model.'

27. Indeed, there are areas of jobs growth which are directly related to housing and population growth, for example in terms of C2 and D1 provision, and indirectly in terms of retail and leisure provision.

28. Furthermore, we know that, even if this were a valid approach in 2016, since the FEMA was produced some economic assumption have simply changed. This is referred to in relation to retail and manufacturing in 4.15 of the LHNA. These would tend to dampen the outputs.

29. More fundamentally, the assumptions about employment in sectors such as retail, may need to be reviewed in the light of the accelerated structural changes that have occurred during the COVID pandemic.

30. Again, it is worth comparing another authority. Blaby in Leicestershire is consulting on its plan. It's HEDNA is more recent than Wiltshire's yet the New Local Plan Options Consultation (Para 4.2.3)[10].

The District Council has been working together with the other local authorities in Leicester and Leicestershire to consider the wider needs for employment land and premises across the functional economic market area. This has been informed by evidence including the 'Housing and Economic Development Needs Assessment 2017' (HEDNA). This is somewhat dated and there have been multiple changes in circumstances including: the economic impacts of the COVID 19 pandemic and Brexit; new Government Planning Policy Guidance; changes to the Use Classes of some employment uses, and amendments to permitted development legislation that allow changes of use to and from employment uses

31. As a result, the authority has identified a need to up-date their evidence. We believe Wiltshire should do the same.

32. The LHNA concludes that 4,781 additional homes are required to meet the jobs requirement. But the OE base line figure is actually 6,221 less than the LHNA figure of 22,389, suggesting that their modelling would not require any additional housing, even if one discounts other factors that may mitigate against the approach being taken.

33. In other words, without more specific growth proposals, this very generalised economic modelling does not seem to me to point unequivocally at a need for

[10] New Local Plan – Blaby District Council

additional housing and there are good reasons to think otherwise, both in terms of the modelling itself and in terms of the Government's aim to direct housing firstly to urban areas.

34. As a result, I consider that the figure of 40,120 using the Standard Methodology should be considered robust and be adopted.

3. Windfalls

35. Having set a housing need figure above the Standard Methodology the plan does not appear to include any allowance for windfalls in determining the level of housing shortfall. 3.15 and 3.16 of the Emerging Spatial Strategy make this position clear. Instead, a brownfield target is created for each area, which is a breakdown of the housing they aim to direct to brownfield sites up to 2031. All together it amounts to 2260 homes, but this is explicitly not included in the overall supply calculation.

36. According to 3.16: 'Homes from previously developed land ideally should be identified by having planning permission or by being allocated in a plan.' Unfortunately, this misses the point of a windfall allowance which accounts for homes not allocated in a plan, where there is compelling evidence of a steady supply.

37. There are some windfalls included in the 2019 Housing Supply Statement up to 2016 but is unclear that any of these are included in the opaque supply figures behind the residual figures in the emerging strategy so I have assumed they are not.

38, Nor does it address the NPPF requirement to give 'great' weight to windfall provision (para 68) and to consider whether there is robust evidence for a windfall allowance (para 70) which can be included in the calculation of housing supply, and which may impact both on whether there is a shortfall and how great that shortfall is.

39. The approach to assessing this is set out clearly in NPPG Guidance on Housing and economic land availability assessment[11] and that would in my view lead to the conclusions that there is compelling evidence of on-going windfall supply.

40. Appendix 5 of the 2019 Housing Land Supply Statement gives some detail about windfalls in Wiltshire from 2006-2019. Permissions dropped after 2010 but completions have remained significant, never dropping below 400 per annum except in 2012 which would probably reflect the impact of the recession. Windfalls account for 27% of delivery during that period. Overall, there were 7471 windfall completions, (970 identified in SHELAAs) which amounts to 575 per annum. In Para A.11 the report is clear that the current level of supply is likely to be maintained:

Given the relatively low proportion of SHELAA sites submitted on brownfield land, this contribution is unlikely to change over time, whilst the overall number of

[11] Housing and economic land availability assessment - GOV.UK (www.gov.uk) 023 Reference ID: 3-023-20190722

windfall completions looks likely to maintain current delivery levels, supplied by the consistent numbers of windfall permissions being granted as shown in recent years

Chart 1: Windfall permissions

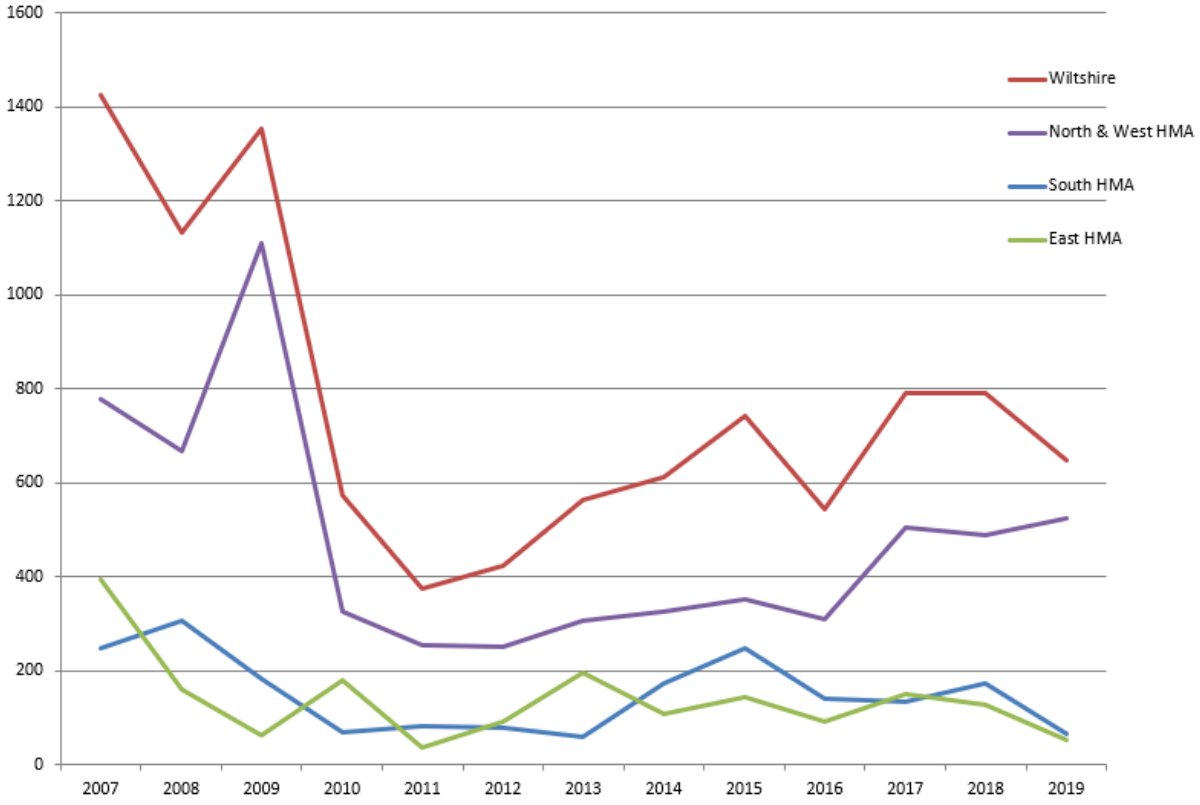
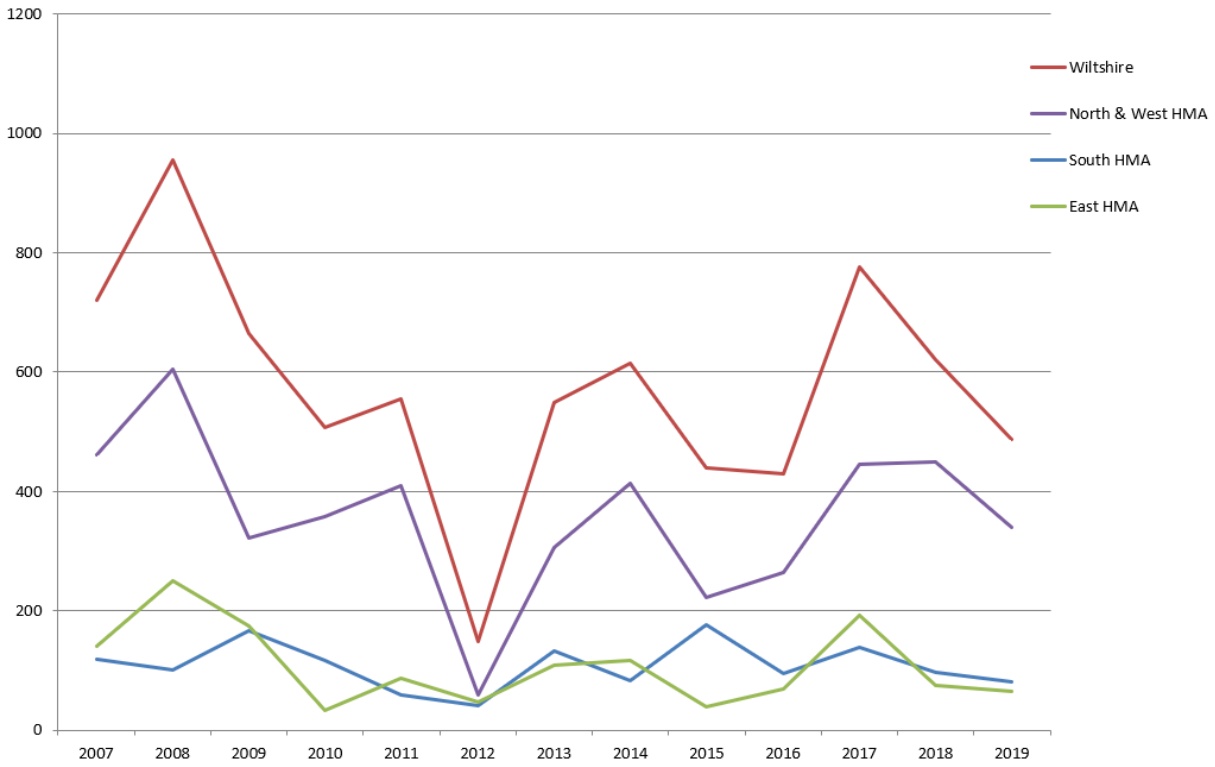


Chart 2: Windfall completions



41. The report also points to changes to permitted development rights as an additional source. In A.17 it suggests, not only small but larger windfall sites are likely to continue to come forwards, something made more likely by the dramatic changes to retail and leisure needs expected post COVID, as major high street shops close.

42. The report then seeks to assess windfalls over the next 5 years based on permissions. It bases this on 590 windfall permissions per annum and then discounts those which are not built year on year. The resulting figure is 1289 dwellings over 5 years or 258 per annum. In A.30 it makes clear that this is a conservative estimate because of the assumptions made in the calculation. It also gives two alternative approaches creating a range between 991 and 1647 for the five years.

43. Not only does it appear that there is compelling evidence that there is a robust windfall supply but the Council themselves have identified a conservative level of windfall supply which they have then not applied to the plan.

44. Returning to the NPPF, if one took the Council's figure of 258 windfalls per annum and assumed it from 2022 -2036 (It is common to discount the first three years of windfalls on the assumption they should already be in the system), one would arrive at a supply figure of 3612. However, it seems to me that the Completions evidence is more likely to be reliable over time, as it avoids the issue of lapsed planning permission, and one could simply assume a conservative figure of at least 400 dpa, or 5,600 homes over the plan period and, if one took the overall average of 575 dpa, 8050 homes in total.

45. It is also to be noted that Wiltshire do not include Greenfield windfalls in their calculation (although this is not stipulated in NPPG or Para 70 of NPPF). This again makes the figures conservative. While such windfalls might not be encouraged (in line with para 68 of NPPF), in as much as they occur, they do provide additional houses within the supply.

46. It would be helpful if there were separate tables of both small (1-9 homes) and larger windfall sites for each market area included in the evidence but I could not find this.

47. In other words, taking a conservative 5,600 (400 dpa) as a compelling windfall level, the overall need figure for Wiltshire would be reduced from 40,120 to 34,520 or, if one accepted the Council's FEMA driven need figure, 40,030.

48. It would be theoretically possible to break down this figure to each HMA and to reduce the overall need figure disproportionately. However, it seems to me that the windfall supply is best addressed at the higher county level, since the supply of windfalls, particularly larger windfalls is, by its nature bitty, (See the graph for Salisbury at 3.10 of the emerging strategy) and there is likely to be compensatory effects between areas.

49. Moreover, since additional supply (perhaps above these conservative levels) is likely given post COVID changes in urban land use, it is likely that the Principal Settlements have a disproportionate role to play in windfall delivery in line with the over-arching aim of the plan.

4. Supply

50. I found the evidence on supply somewhat obscure and I have significant concerns about how easy it is for someone externally seeking to examine the level of supply (either at a macro or micro level) to do so.

51. In terms of proposed sites, I could not find a single list of all these included in the plan consultation. Nor could I find up-to-date estimates of the anticipated yield from individual sites, except in the case of the Principal Settlements.

52. The site selection documents include SHELAA references but since the sites are not necessarily in the same designated area in the SHELAA documents as in the Site Selection paper, it is made difficult to marry the SHELAA evidence and the Site Selection evidence. Moreover, yields in the SHELAA appear to be only approximations based on 30 dwellings per hectare and not site examinations.

58. In Appendix 1 I have shown a table of sites which I extracted easily from the Wyre Forest Plan SHELAA evidence which informed their plan. I would have liked to take a similar approach in this case but was unable to do so.

59. This means that for someone considering a local area, even if they add up the yield from sites in the area in the SHELAA, they are not in a position to compare it with the totals given in the consultation. For example, in Amesbury, the SHELAA value for sites 3379 and 3186 is 417, more than the residual target, but it is unclear if that is the achievable yield from the site, especially as no figure is given in the Consultation Documentation itself. The Council suggests they are pausing the process so they can consult on alternative sites in non-Principal Settlements, but that can only be done if the consultee has the appropriate information.

60. In the case of the Principal Settlements more detailed estimates are given in the Site Selection Documents.

61. I looked specifically at Chippenham where a yield of 5586 is given for all three preferred sites. However, if one goes to the SHELAA (where one has to add up the individual parcels), Site 1, for example, comprises 7472 homes. Clearly, this figure has not accounted for the constraints on the site such as the flood plain, so is exaggerated.

62. However, when one comes to the Sustainability Appraisal the figure for that single site is between 6100 and 8539 (the latter figure based on a simple 35 dpa). This raises concern that weight has been put in the Sustainability Appraisal on a housing yield which is not the yield the plan makers anticipate. This brings into question the validity of the SA result.

63. A further issue arises in relation to density policy. There is no density policy in the plan, nor is there any consultation question in relation to density. It is unclear what density assumptions are being made in the design process.

64. So, for example, the yield of 2975 homes on Site 1 in Chippenham might be increased if a minimum density policy were in place. It would seem to me that a reasonable alternative within the plan that should be consulted on is a minimum housing density requirement. The consultation does not allow one to consider that.

65. In other words, it is not possible in any meaningful way to consider how far the sites identified relate to the target residual supply or to come to a meaningful view as to which sites might be required. One cannot simply say whether the sites identified match the residual need or whether they exceed it and by how much, making any meaningful choice difficult to make. Nor is it possible to address the balance between density and land-take across a housing market area.

66. The other problem with the approach to the consultation is that it seems to be assumed that the targets for each sub-area should be met at each sub-area level. In fact, the housing need exists at a housing market area level, so the first question should be whether the housing supply is sufficient for that market area.

67. The current approach risks over-supplying in each settlement and that over-supply accumulating across a housing market area. This is evident where a local area is listed in the plan as not having a residual need (marked ‘0’ in the table.)

68. Some of those areas may have an excess of existing supply in place which could offset need elsewhere in the HMA if the supply data for each local area was actually tabulated in the plan.

We did ask the Council to provide: *'the breakdown of the sources of supply which informed the residual calculation for each local area broken down by category i.e., permissions, commitments etc... (In most cases this will sum to the difference between the strategy figure and the residual figure but in cases where the residual supply is 'Zero' the total may, of course, exceed the difference between the strategy figure and the residual figure.)'*

69. Instead, (see Appendix 2) they referred us back to the housing land supply statement. This is itself difficult to marry up with the emerging figures.

70. The tables in their Appendix 1 are based on the old housing market areas and it is unclear whether or not windfalls should be included when comparing it with the Emerging Plan and to which settlements they have been assigned if they have.

71. I did add up all the supply identified for Devizes in that Appendix and arrived at a figure of 876 which is different to the emerging plan where the gap between need and residual is 1000. There may be a good reason for this but currently one has to compare apples with pears so it is not clear.

72. In the case of Wilton where the residual is zero, the supply given in the statement is 482 above the 400 given as the figure for need. This suggests some over-supply which has not been included in the HMA supply calculations. However, because the two documents are inconsistent in regards to the areas involved it would be difficult to marry the two. This is, in my view, something which could have been avoided if the Council provided clear up-to-date supply tables based on the emerging market areas.

73. So, while it is quite appropriate for the Council to ask stakeholders to consider the spatial distribution of housing between settlements, the consultation does not allow one straightforwardly to consider the overall housing supply for each housing market area.

74. The only way to resolve these issues is to a. review the proposed sites and provide an expected yield in a format which is easy for external consultees to navigate and b. provide a breakdown of the key elements of the existing supply for each sub-area (as set out in the emerging plan), broken down into commitments, permissions etc…

5. Conclusion

75. I am not convinced that there is a case for additional housing above the Standard Methodology figure of 40,120.

76. There also appears to be compelling evidence for an on-going windfall supply of 400 dpa across Wiltshire, which would leave a residual requirement of 34,520 homes.

Dividing those between the housing market areas in line with the current balance of housing would lead to the following figures.

	Total	Supply[12]	Residual
Chippenham	14706	10540	4166
Salisbury	8837	8315	522
Swindon	2485	2020	465
Trowbridge	8457	7795	662

77. This would require significantly lower housing allocations which could easily be accommodated on some of the sites identified in the Principal Settlements or with a reduction of need reflected across the local areas in each HMA.

78. Based on 40,030 (the LHNA figure with windfalls included) the table would be as follows:

	Total	Supply	Residual
Chippenham	17053	10540	6513
Salisbury	10248	8315	1933
Swindon	2882	2020	862
Trowbridge	9807	7795	2012

79. Taking account of the evidence on Need and Windfalls I would suggest the need for housing allocations should be reduced across Wiltshire. It is worth noting that if the 5,200 windfalls are added to the 45,630 allocated sites in the plan the total provision would be 50,830 homes (even excluding any over-provision when the local totals are added). This would be 21,150 (or 71%) above the actual ONS2014 demographic need of 29,680.

80. I have not considered the distribution of housing but CPRE will want to identify those sites which do least damage to the countryside, which I suggest should be done at an HMA level, although, as set out above, I have concerns about the evidence base in this regard.

81. CPRE may also wish to consider whether a minimum density policy should be adopted within the plan.

[12] *Note: the supply figure in both tables is based on subtracting the residual requirement from the emerging strategy in the plan, however it should be noted that in some local cases the residual supply is zero, in which case there may be oversupply in that area which is not accounted for so these figures may underestimate supply

Appendix 1:

Green Belt Supply Side Table for Wyre Forest

Plan Table	Ref	Site	Dwellings	Hectares	Housing/Mixed
30	WFR/WC/18	Sion Hill School Site	56	2.1	H
30	WA/KF/3	Land at Low Habberley	120	5.6	H
31	WFR/WC/15	Lea Castle Hospital	600	48.4	M
31	WFR/WC/32	Lea Castle East	300	19.9	M
31	WFR/WC/33	Lea Castle West	400	24.5	M
31	WFR/WC/34	Lea Castle North	100	11.5	H
32	OC/5	Land at Husum Way	30	2.1	H
32	OC/6	Land East of Offmore	300	28.36	H
32	OC/12	Comberton Lodge Nursery	10	0.8	H
32	OC/13N	Stone Hill North	1100	57.1	M
33	AKR/18	Yew Tree Walk	85	3.73	H
33	LI/11	Land West of Former School Site, Coniston Crescent	200	9.53	H
33	MI/38	School Site, Coniston Crescent	115	3.64	H
34	WA/BE/1	Stourport Road Triangle	100	3.67	H
34	WA/BE/3	Cathcem's End	75	5.61	H
34	WA/BE/5	Land South of Habberley Road	35	1.71	H
Total			**3626**		

Wyre Forest Green Belt housing sites from Tables 30-36 in Pre-submission Plan (not including Traveller Sites and Economic Development Proposals)

Appendix 2:

E-mail response to Geraldine White, CPRE Wiltshire Administrator from Chris Roe

Dear Ms White

Thank you for the enquiry. I've provided responses to Anne Henshaw's letter dated 8 February 2021 in red below.

1. Could you provide the breakdown of the sources of supply which informed the residual calculation for each local area broken down by category i.e., permissions, commitments etc... (In most cases this will sum to the difference between the strategy figure and the residual figure but in cases where the residual supply is 'Zero' the total may, of course, exceed the difference between the strategy figure and the residual figure.)

   The 2019 Housing Land Supply Statement provides a comprehensive list of the sources of supply and the stage of development (e.g. outline/detailed permission, committee resolution, allocation) that each site has reached. This is available on the Council's website but I've attached a copy to this email.

   - Appendix 1 (page 17 onwards) includes a site-by-site list of Large sites and allocations (including Neighbourhood Plan allocations). The final column in the table indicates which settlement or Community Area rural remainder the site contributes to. The table is organised by the HMAs set out in the Wiltshire Core Strategy.
   - Appendix 2 (page 41 onwards) includes a list of Small sites with planning permission. Again, this is organised by WCS HMA, then by the main settlement or Community Area rural remainder that each site contributes to.
   - If you are looking to identify the sources of supply for each of the emerging HMAs (as set out in the Emerging Spatial Strategy consultation paper) you will need to assign sites in the Melksham Community Area to the emerging HMA they sit in as this Community Area split is split between the Chippenham HMA and Trowbridge HMA. I've provided this in the attached spreadsheet as the data in the Housing Land Supply Statement does not show this.

2. Could you provide a table of historic windfall completions for each HMA split between small and large windfalls. I am assuming the definition you use of small windfalls is 1-9 homes but let me know if it is different.

   I've attached a list of brownfield windfall completions and losses in the WCS period to date (2006-2019), including whether they are part of a Small site (<10 dwellings) or a Large site (10+ dwellings). They're listed on a building basis (i.e. house or blocks of flat) so there will instances where there are multiple entries for a particular site. However I trust the data provided should be sufficient to identify the location of the relevant sites.

I hope this provides the information you requested, but please come back to me to if you'd like any of the data clarified.

Best regards

Chris

Chris Roe, Spatial Planning Manager (Monitoring & Evidence), Wiltshire Council