

September 2021

Gypsies and Travellers Development Plan Document Consultation Report

Regulation 18 Town and Country Planning (Local Planning)
(England) Regulation 2012 (as amended)

Wiltshire Council

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1. Introduction

- 1.1 The Council is preparing a Gypsies and Travellers Development Plan Document ('the Plan'), which will form part of the Local Plan for Wiltshire. As set out in the July 2020 Council's Local Development Scheme (LDS)¹ the Plan will:

“identify the future level of need for accommodation for Gypsy and Travellers, including travelling showpeople to 2036. It will identify sites to meet permanent and temporary accommodation needs and focus on Core Policy 47 ‘Meeting the needs of Gypsies ad Travellers’ of the Wiltshire Core Strategy.”

- 1.2 Following approval by Wiltshire Council's Cabinet on 13 October 2020², a consultation on the scope and content of the Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) took place between 13 January and 9 March 2021. This report documents the consultation process that was undertaken and the outcome of the consultation.

¹ <https://www.wiltshire.gov.uk/planning-policy-lds>

² See Agenda Item 117

<https://cms.wiltshire.gov.uk/ieListDocuments.aspx?CId=141&MIId=13083&Ver=4>

2. How to use this document

2.1 This consultation statement is broken down into a series of sections and appendices that cover all elements of the consultation, as follows:

- **Section 3** provides an explanation of the purpose and content of the January to March 2021 consultation.
- **Section 4** details the consultation methods deployed throughout the January to March 2021 consultation.
- **Section 5** provides a statistical overview of the representations received.
- **Section 6** sets out a summary of the comments and issues raised during the consultation.
- **Section 7** details the Council's proposed next steps in response to the comments and issues raised during the January to March 2021 consultation.
- **The appendices** to this report set out further detail, including several examples of engagement undertaken and copies of all representations received.

3. Process of Consultation

3.1. Comments were invited during an eight-week consultation period between 13 January and 9 March 2021. The consultation was planned in accordance with Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which states:

“(1) A local planning authority must-

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and*
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.*

(2) The bodies or persons referred to in paragraph (1) are-

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed plan;*
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and*
- (c) such residents or other persons carrying on business in the local planning authority’s area from which the local planning authority consider it appropriate to invite representations.*

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).”

3.2 The consultation invited comments on two main documents:

‘Planning for Wiltshire’s Gypsy and Traveller Communities Consultation Document’

‘Wiltshire Council, Gypsy and Traveller Accommodation Assessment, June 2020 (Opinion Research Services)’

All the information that was published is available on the Council’s website at www.wiltshire.gov.uk/planning-gypsy-travellers

3.3 This report provides a summary of the actions that were taken to raise awareness of the consultation in accordance with the relevant regulations and the Council’s ‘Statement of Community Involvement (2020)’, ‘Statement of Community Involvement Temporary Arrangements’ and a summary of process and outcomes of this engagement exercise.

3.4 A summary of the content consulted upon can be viewed within Table 1.

Table 1: List of documents consulted upon through the Gypsies and Travellers DPD Regulation 18 consultation that took place between 13 January and 9 March 2021

Document(s)	Further information
Planning for Wiltshire’s Gypsy and Traveller Communities Consultation Document	This document sets out the proposed scope of the Gypsies and Travellers DPD, which is to allocate land for travellers in sustainable locations meeting identified permanent and temporary accommodation needs up to 2036, in line with Government planning policy and legislation.
Wiltshire Council, Gypsy and Traveller Accommodation Assessment, June 2020 (Opinion Research Services)	A key piece of evidence informing the Plan is the Wiltshire Gypsy and Traveller Accommodation Assessment (GTAA), dated June 2020. The study identifies permanent and temporary accommodation needs for gypsies and travellers and travelling showpeople for 2019-2036.

4. Consultation methods

- 4.1 Consultation on the Plan ran from 13 January to 9 March 2021 (a period of eight weeks).
- 4.2 Due to the ongoing COVID-19 pandemic the consultation was carried out in line with the Council’s adopted Statement of Community Involvement (SCI) and Temporary Arrangements (July 2020). The temporary arrangements document represented a response to guidance³ to Local Planning Authority’s to review their SCI in accordance with Government advice aimed at preventing the spread of COVID-19.
- 4.3 The measures within the Temporary Arrangements document reflect the necessity to allow plan-making to progress while promoting effective community engagement by means which are reasonably practicable.
- 4.4 The consultation was also undertaken in full accord with The Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020. This emergency legislation changed the requirement under Regulation 35(1)(a) of The Town and Country Planning (Local Planning) (England) Regulations 2012 for councils to make copies of development plan documents available for inspection at their principal offices and at such other places within their area as the local planning

³ Planning Practice Guidance: Plan Making <https://www.gov.uk/guidance/plan-making> (Paragraphs 077 & 078).

authority consider appropriate, during normal office hours. A council can instead comply with Regulation 35(1)(a) by making development plan documents available on their website. This change applied from 16th July 2020 until 31st December 2020 but was extended until 31 December 2021.

Who was consulted and how?

4.5 Utilising the SCI alongside legislative criteria governing regulatory stages of plan making⁴, the following organisations, groups and individuals were notified of the consultation and invited to comment:

- Specific consultation bodies (including Environment Agency, Natural England, Historic England, NHS and, Highways England)
- Specific Gypsy and Traveller organisations and planning agents operating in Wiltshire
- Neighbouring local authorities
- All parish and town councils
- Parish and town councils adjacent to Wiltshire
- Wiltshire Councillors
- Individuals, community groups and organisations who have previously requested to be informed about updates relating to Wiltshire planning policy

4.6 Consultees were made aware or formally notified of the consultation through a variety of means as illustrated within Table 2. The Council concurrently ran a consultation on the Wiltshire Local Plan Review and formal and informal notifications advertised both the Wiltshire Local Plan Review consultation and the consultation on the Gypsies and Travellers DPD.

Table 2: Lists various means by which consultees were made aware of the Gypsies and Travellers DPD consultation.

Consultation method	Further information
Notification emails sent to Spatial Planning mailing list (circa 1,500 recipients on mailing list)	Contact was made with consultees on Wiltshire Council’s Spatial Planning mailing list, including those who asked to be notified on the progress on the Wiltshire Local Planning policies. Notification dates included 06/01/21 (Appendix 1), 13/01/21, 22/02/21, 23/02/21.

⁴ The Town and Country Planning (Local Planning) (England) Regulations 2012

Consultation method	Further information
<p>Notification letters sent to Spatial Planning mailing list (circa 78 recipients on mailing list requested postal notifications)</p>	<p>Postal contact was made with consultees on Wiltshire Council's Spatial Planning mailing list who requested to be notified via this means. The notification letter sent at the beginning of the consultation can be viewed at Appendix 2.</p>
<p>Inclusion within Wiltshire Council email newsletter sent to residents (circa 23,000 recipients on mailing list)</p>	<p>Information advising residents of the Gypsies and Travellers DPD Regulation 18 consultation was included within a newsletter sent to residents on the mailing list on 13/01/21 (Appendix 3).</p>
<p>Inclusion within Wiltshire Council email newsletter sent to two stakeholder mailing lists (circa 1,500 recipients on mailing list)</p>	<p>Information advising two stakeholder mailing lists of the Gypsies and Travellers DPD consultation was included within newsletters sent on the mailing list on the dates 06/01/21 and 13/01/21 (Appendix 4).</p>
<p>Inclusion within newsletter sent to Wiltshire Council members (98 recipients on mailing list)</p>	<p>Information advising Wiltshire Council members of the Gypsies and Travellers DPD Regulation 18 consultation was included within newsletters sent to members on the mailing list on the 13/01/21 (Appendix 5).</p>
<p>Inclusion within newsletter sent to Wiltshire town and parish councils (circa 250 recipients on mailing list)</p>	<p>Information advising Wiltshire Council town and parish councils of the Gypsies and Travellers DPD Regulation 18 consultation was included within newsletter sent to all town and parish councils on the 13/01/21 (Appendix 6).</p>
<p>Social Media (reach 764,775)</p>	<p>Information advertising the Gypsies and Travellers DPD Regulation 18 consultation was shared across 48 posts in total, 24 on Facebook and 24 on Twitter. This had a reach of 764,775, received 130,892 impressions and 290 retweets/shares (combined with the Wiltshire Local Plan Review consultation).</p>
<p>Public Notice</p>	<p>Public notices were placed within local newspapers covering the county, namely the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald. The notice published, during week commencing 11th January, can be viewed at Appendix 7.</p>
<p>Press releases</p>	<p>A series of press releases were issued advertising the Gypsies and Travellers DPD Regulation 18 consultation, namely:</p>

Consultation method	Further information
	<ul style="list-style-type: none"> • 18/12/20: “Sign up to online events and have your say about where future developments should take place in Wiltshire” (Appendix 8). • 13/01/21: “Consultation into the Wiltshire Local Plan begins today” (Appendix 9). • 10/02/21: “More than 1,300 people attend Local Plan review engagement sessions as consultation continues” (Appendix 10). • 02/02/21: “There is still time to take part in the Wiltshire Local Plan review consultation” (Appendix 11). <p>Each press release is placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.</p>
<p>Spatial Planning online events</p>	<p>The consultation on the Gypsies and Travellers DPD was also advertised during 17 online consultation events for the Wiltshire Local Plan Review, that were attended by 1,321.</p>

4.7 As noted throughout the advertisement material, the consultation documents were made available to view on the Wiltshire Council website. Respondents were able to respond to the consultation via post, email, or the use of online Microsoft Forms (an example of the online form is available to view in Appendix 12).

4.8 Arrangements were also put in place to allow people who did not have access to the internet to have hard copies sent to them by post. Those community members and stakeholders requiring alternative access to documents, including hard copies, were encouraged to contact Wiltshire Council by phone to request this service.

Gypsy and Traveller specific consultation methods

4.9 The SCI acknowledges that travellers are an underrepresented group. To encourage participation, approximately 350 leaflets were sent to all traveller pitches on lawful and unauthorised sites in the county in January 2021, and again in February 2021. Travellers were encouraged to respond to the consultation by telephone or using the consultation website. The Council also employed Opinion Research Services (ORS), a consultancy that undertook the latest Gypsy and Traveller Accommodation Assessment (June 2020) (GTAA), to receive telephone consultation responses on behalf of the Council. Contact telephone

numbers for officers and ORS staff were provided on the leaflets (see redacted leaflets at Appendix 13).

- 4.10 The Council offered travellers to respond to the consultation by telephone so there would be a more personal way of submitting comments. This recognises the widely acknowledged importance of the spoken word in traveller communities.
- 4.11 Using online or paper-based consultation media is relatively uncommon in traveller communities and by offering alternatives the Council sought to encourage participation.
- 4.12 Telephone conversations with travellers took place in an informal fashion. This means that general planning matters and other issues could also be raised and discussed with officers or ORS, to allow for effective engagement. All telephone calls received were recorded using a standard template (Appendix 14). Due to the sensitivity of the information shared during the telephone conversations the telephone transcripts would have to be heavily redacted and therefore they have been omitted from being included as an appendix to this report. However, the telephone transcripts have been summarised below.
- 4.13 In addition, the Council sought to engage with travellers on unauthorised encampments through its Highway Enforcement Officers during the consultation period, to understand their views on provision of emergency stopping sites proposed in the consultation document.

Call for sites

- 4.14 The main consultation document also included a 'Call for Sites' inviting potential development sites to be submitted to the council for consideration. This is advertised on the Council's website.

5. Representations

5.1 A reasonable response was received to the consultation. Overall, 45 representations were made in writing from 44 respondents. One consultation response was received in duplication. Further detail can be found within Table 3.

Table 3: Provides a statistical overview of the number of comments received and from how many respondents they were received from.

Respondent by type	Number of representations received
General public	18
Parish/Town Council	11
Neighbouring Authority	5
Planning Agent	4
Specific consultation bodies	4
Other	2
Total	44

5.2 In addition, 20 travellers responded to the consultation by telephone. The Council also engaged with travellers on an unspecified number of unauthorised encampments regarding the use of emergency stopping sites to understand the perspective of the traveller community.

5.3 The consultation document posed eight questions. A breakdown of responses against each question is provided in Section 6.

6. Summary of comments and issues raised

- 6.1 This section sets out an overview of the comments and issues arising from the consultation. These represent a summary of the representations received with the issues being presented in no order of importance.
- 6.2 The presentation of the comments and issues raised is structured in a tabular format. Table 4 provides a summary of the comments made by specific consultation bodies. Table 5 provides a summary of comments together with the main issues made through written comments to the Plan as per the consultation question they relate to. All individual comments received can be viewed at Appendix 15.
- 6.3 This is followed by a by a summary of the comments and issues arising from the telephone engagement with travellers (Table 6). Finally, comments received as part of the engagement with travellers who were part of the unauthorised encampments are detailed in paragraph 6.8.
- 6.4 The comments and issues raised during the consultation will inform the next steps of the Plan as outlined in Section 7.

Consultation responses

6.5 A summary of comments from specific consultation bodies can be found within Table 4.

Table 4: Provides a summary of comments from specific consultation bodies on the Gypsies and Travellers DPD Regulation 18 consultation.

Comments from specific consultation bodies
<p>Environment Agency</p> <ul style="list-style-type: none"> • Requested consideration of boreholes and Source Protection Zones in site assessments. <p>Highways England</p> <ul style="list-style-type: none"> • Requested that the criteria wording better reflects the requirements of the National Planning Policy Framework and outline that ‘vehicular access should be safe and suitable for all users and that the proposed development does not result in an unacceptable impact on highway safety.’ <p>Thames Water</p> <ul style="list-style-type: none"> • Wastewater infrastructure/pumping facilities, Sustainable Drainage Systems (SuDS) and water consumption are a relevant consideration in planning terms. Suggest policies for inclusion in the draft Plan to cover those aspects. <p>New Forest National Park Authority</p> <ul style="list-style-type: none"> • It would be helpful if the Plan clarified that it does not relate to the whole of the administrative area of Wiltshire Council, but excludes that area of the New Forest National Park in Wiltshire, which is covered by the National Park Local Plan. • There is no unmet need in the National Park that may have to be met in a neighbouring authority area • The emergency stopping sites criteria could also make reference to the New Forest National Park (and its setting and special qualities), as well as AONBs • It is unclear from the consultation document how many new site allocations may potentially be required in the Local Plan period up to 2036, or how wide any broad growth area may be. <p>South Gloucestershire Council</p> <ul style="list-style-type: none"> • The consultation document is clear, concise and presents an appropriate approach to identifying sites and broad locations for growth to meet permanent and temporary accommodation needs. • The Council looks forward to further opportunities to engage with Wiltshire colleagues constructively and actively as plan preparation progresses.

South Somerset District Council

- Document may benefit from a section setting out how the travelling communities will be engaged in the site identification process going forward
- Objective 3 may benefit from reference to health and education facilities
- The proposed approach to meeting accommodation needs appears logical.
- Support expressed for both set of site selection and assessment criteria

Dorset County Council

- Unclear if the plan will also relate to those people who associate themselves as ethnic Gypsies, Travellers and Travelling Showpeople or New Age Travellers, but who no longer meet the definition in planning policy.
- Whether the distribution of planned emergency stopping sites reflects the distribution of unauthorised encampments (if there is any pattern to the distribution of these encampments) or whether the proposed encampments will have sufficient capacity to meet this need.
- It is unclear whether Wiltshire Council intends to make specific allocations through this plan to meet the need. How many pitches and plots will be deliverable through intensification? How many new sites will be needed?
- Criterion i) is too onerous and seeks to require applicants to demonstrate that they considered brownfield land first

West Berkshire Council

- There may be cross-boundary implication associated with the provision of emergency stopping sites depending on where they will be located
- West Berkshire through its current Local Plan Review will monitor any cross-border issues with meeting need particularly in the western side of the District the Council and will make contact with Wiltshire Council, and other neighbouring authorities.

6.6 A summary of the main issues raised, against each consultation question, can be found within Table 5.

Table 5: Provides a summary of comments, alongside main issues, on the Gypsies and travellers DPD Regulation 18 consultation.

Consultation question one: Do you have any comments on what the plan should contain?
<p>27 written responses were received to this question. 2 responses expressed that they did not support development of a Plan for travellers. 5 responses expressed support for the scope of the Plan. All other responses did not indicate support or no support but raised issues the Plan should address. The main points raised were:</p> <ul style="list-style-type: none">• That the Plan deals with the effects of untidy sites.• That the Plan considers provision of transit sites and not only emergency stopping sites.• Support for the Council’s intention to plan for the accommodation needs of travellers that do not meet the planning definition.• That the emerging Plan should achieve a more even distribution of sites across the county.• That the Plan investigates the scope for private transit pitches for family and friends.• That the Plan sets out the costs of site provision.• That information such as accommodation evidence, location of sites and maps are presented in an easy-to-understand fashion.• That the Plan should address boater accommodation requirements.
Consultation question two: Do you agree with the proposed plan objectives? Please explain your answer.
<p>32 written responses were received to this question. 25 supported the objectives either fully or conditionally. Other matters raised in response to this question were:</p> <ul style="list-style-type: none">• That the Plan includes information on the cost of site provision.• Concerns about the effects of new sites on local infrastructure and services/facilities, and the need to provide access to health and education facilities.

Consultation question three: Do you support the GTAA findings?

29 written responses were received to this question. 14 were fully or broadly supportive of the findings. 5 were not, and the rest were unable to comment or could not agree or disagree. The main comments regarding the GTAA findings were:

- How the Plan will consider undetermined need and need from households who do not meet the planning definition in Planning Policy for Traveller Sites.
- A specific respondent criticised the GTAA on the basis that: no review of previous studies was undertaken; low survey response rate; application of the planning definition only to households that travel for work but not those who travel to fairs etc; challenge to the number of undetermined households who might meet the planning definition.

Consultation question four: Do you agree or disagree with the proposal to provide three emergency stopping sites?

32 responses were received to this question. 25 agreed either fully or conditionally, 5 disagreed, and the remaining 2 did not provide a clear answer. Main comments were:

- The Plan should clarify the location (near strategic routes), length of stay, clean-up costs and overall responsibility for the running and maintenance of emergency stopping sites.
- That the Plan should consider provision of private transit pitches on existing sites as visitors would know the families.
- That the Council follows a coordinated approach with neighbouring authorities.
- That the Council should introduce the concept of negotiated stopping.

Consultation question five: Do you agree with the proposed approach to meeting accommodation needs?

32 responses were received to this question. 22 respondents supported the approach; 5 did not; and the remaining 5 comments expressed no objection or support. Main issues raised were:

- That the Plan should not reward those who did not obtain planning permission by regularising unauthorised developments.
- That the Plan should make more social provision for households that are unable to afford their own sites.
- That privately rented pitches cause too much uncertainty and can result in non-traveller occupation and are therefore not a suitable product to consider.

- That the Plan considers the capacity of local infrastructure and services/facilities.

Consultation question six: Do you agree with the proposed criteria?

30 responses to this question were received. 15 responses supported the criteria by answering 'yes', or 'yes subject to'. Five respondents disagreed with the criteria. Eight respondents didn't state 'yes' or 'no' in their response but provided comments. 2 representations stated: 'no comment'. Main issues raised were:

- How does the Plan consider preventing travellers from other parts of the country arriving and occupying Wiltshire sites?
- That the Plan's policies should be sufficient to determine planning applications without the need to consult other specialist policies in the development plan.
- The proposed criteria should reflect effects of sites on the entire local community not just neighbouring properties.
- Criterion i. is too onerous as Planning Policy for Traveller Sites (August 2015) (PPTS) makes it clear that applicants do not need to demonstrate availability of alternative sites. It may also hinder identification of sites in the Plan to meet identified need.
- That it is questionable if land last occupied by farmyards meets previous developed land definition in NPPF.
- In regard to Criterion iv the Plan should consider off-grid solutions also.
- That the proposed distance of 3km to schools and surgeries is too narrow and the Council should consider 5 miles as a minimum because Wiltshire is a rural county and Planning Policy for Traveller Sites does not prohibit traveller sites in rural areas.
- That the proposed distance of 3km should be changed to 'reasonable distance'.
- It was commented that in terms of physical access, pedestrian access may not be achievable for sites in rural locations.
- It was suggested to define 'unacceptable impact' in Criterion vii better as this can be interpreted subjectively – for example 'significant adverse impact'.
- It was commented that Criterion ix in combination with Planning Policy for Traveller Sites paragraph 25 is very subjective and hard to apply in practice. It was suggested that the Plan could appraise the effects of sites on the scale and character of its surroundings and nearby settlements based on site size and proximity to surroundings.
- It was proposed that Criterion x should read 'not compromise the purposes of a designation'. It was stated that it is unreasonable to require no adverse effect on other matters as any new development is going to have some impact. This should read 'no significantly or undue adverse effect incapable of mitigation'.

Consultation question seven: Do you agree with the proposed selection criteria for emergency stopping sites?

27 responses were received. 12 respondents supported the criteria in full or part, but suggested amendments. 7 respondents did not agree or disagree but suggested changes. 6 disagreed, and 1 respondent stated 'no comment'. 1 respondent referred to their consolidated response. Main points raised were:

- The Plan should clarify who has maintenance and management responsibilities.
- It should be explained what tools are available to stop these sites becoming permanent encampments.
- The Plan should explain how many pitches will be provided on these sites.
- The Plan should ensure that these sites are well away from residential areas.
- It was pointed out that sites can be in flood zones where this is proven to be safe.
- It was stated that the sites should be within a 'reasonable distance' to travelling routes rather than 'near/adjacent to'.
- That the criteria should ensure that sites must be accessible for emergency/rubbish disposal vehicles.
- It was queried what the internal dimensions would be for proposed emergency stopping sites.
- Comments sought clarification if there is evidence that emergency stopping sites work in practice?
- It was suggested that private transit sites should play a role in meeting temporary accommodation need.
- That sites which are near or adjacent to main roads, noise from the roads may unduly affect site users.
- That sites should be equipped with running water and sewerage disposal in addition to toilets, skip and hardstanding; and the importance of children's safety was also raised.

Consultation question eight: If you have any further comments you wish to make, please detail them below.

19 respondents responded to this question. Most comments reiterated comments made in response to previous questions. Main points raised were:

- The Cranbourne Chase AONB commented in support of the Plan but also appended references to the management plan.
- The GTAA should be updated prior to the next consultation.
- Confirmation should be secured from the traveller community on each site that the layout and accommodation proposed on each proposed site allocation meets their requirements and is deliverable.
- Council to consider if the consultation arrangements were satisfactory and consistent with national law/policy due to the pandemic. There were no notifications sent to those living directly adjacent to traveller sites.

- Cricklade currently is well served with traveller sites having 62 pitches within 4 miles of the town centre. This is approximately 20% of all the 318 authorised pitches in Wiltshire.

Telephone consultation with travellers

6.7 A summary of telephone conversations with travellers is provided below. Telephone consultation was conducted informally to avoid a rigid question/answer pattern with an audience often unfamiliar with planning matters. Opinion Research Services assisted with the consultation. During the conversation the purpose of the Plan, and approach to meeting accommodation needs was explained. A summary of comments received can be found within Table 6.

Table 6: Provides a summary of comments from telephone consultations with travellers.

Comments from telephone conversations with travellers
<p>Twenty telephone conversations with members of the travelling communities were recorded with agreement of the callers. 8 individuals called twice = 16 calls. All callers were ethnic gypsies/travellers, but no showpeople or new age travellers called. Main issues raised were:</p> <ul style="list-style-type: none"> • That new accommodation need was not captured in the 2020 GTAA. • The issue of ongoing appeals, enforcement and planning applications which makes it harder for travellers to meet their accommodation needs. • That it feels to travellers that the planning system is designed to refuse permissions for permanent sites. • Travellers raised the importance of utilities and grid connections. • Permanent site provision is very important so that households with poor health can access medical services. • The Plan should consider private transit pitches on existing lawful sites to assist with temporary accommodation provision. • That travellers experience antisocial/racist behaviour. • Suggestion that Wiltshire Council constructs sites/plots (concrete surface, boundaries, services) and either sell or rent to traveller community on a plot-by-plot basis. • In terms of emergency stopping sites, it was suggested that sites close to main roads reduce fly tipping whilst those in rural area, whereas sites off minor roads attract this. • Emergency stopping sites attract those who tend to leave them in a poor condition (rubbish, etc.). • It was raised that more permanent sites are needed for those who can settle for longer.

Engagement with travellers on unauthorised encampments

6.8 The general feedback from the engagement on unauthorised encampments was that temporary sites would be used by some but not everyone. In relation to costs, respondents were not very supportive but understood services needed paying for such as waste, water, and toilets so they would expect these in exchange. The general view was however that travellers would not use sites if there was a charge. Location was an important factor. If the site was too far away from their route travellers would not use it.

7. Next steps

7.1 The purpose of the consultation was to invite comments on the scope of the Plan. Views submitted will inform the plan making process in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

7.2 Table 7 presents a summary of the main actions arising from the consultation.

Table 7: Presents a summary of actions arising from the consultation

Summary of actions

- An update to the Gypsy and Traveller Accommodation Assessment (ORS, June 2020) to incorporate latest evidence on planning permissions and any new accommodation need.
- Ongoing cooperation with neighbouring authorities.
- Investigating additional options for temporary accommodation, such as private transit pitches and negotiated stopping.
- Review of locational criteria for provision of permanent sites and emergency stopping sites.
- Detailing the management and maintenance of proposed emergency stopping sites.
- Gathering evidence on pitch deliverability and preferred products.

7.3 Now the consultation has been completed all representations will be considered in preparing the draft Plan and further work undertaken in response to these to develop evidence to inform its policies. Once the draft Plan is prepared this will be considered by Wiltshire Council's Cabinet and Council before the Plan is published and a final stage of

consultation is undertaken - known as the Regulation 19 Town and Country Planning (Local Planning) (England) Regulations 2012 stage.

- 7.4 The draft Plan published at the Regulation 19 stage will be the Plan that the Council intends to submit for examination. The Regulation 19 consultation will focus on whether the Plan is legally compliant and sound using the tests set out in the National Planning Policy Framework at paragraph 35. The Regulation 19 consultation documentation will make it clear where comments received during the Regulation 18 consultation have been considered and the consequence of those considerations.

Appendix 1

Please see overleaf a copy of the notification email sent to all those on the Spatial Planning mailing list. This copy represents the notification sent on 06/01/21. Other notifications were also sent on 13/01/21, 22/02/21, 23/02/21.



6 January 2021

Dear Resident

Wiltshire Local Plan review consultation

The consultation into the Wiltshire Local Plan review, and separately the Gypsy and Traveller Local Plan, will run from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021.

Wiltshire Council has to allocate sufficient land to satisfy housing and employment needs up to 2036, and is seeking the views of local communities and stakeholders to see if the suggested distribution of numbers across the county is correct, and which of the proposed sites are most suitable.

Feedback during this review consultation will help to shape the draft Local Plan, which will be finalised later in 2021. It will then be used to guide decisions on whether future planning applications for housing, infrastructure and land for employment can be granted.

As COVID restrictions mean that face-to-face events will not be possible during this review, the council is holding a series of online events for people to find out more about the Local Plan. Each event relates to a particular settlement, and there are also two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

The online events, which will be held from 7pm-8pm on the dates shown are as follows:

- Planning for Calne, Monday 18 January
- Planning for Corsham, Tuesday 19 January
- Planning for Royal Wootton Bassett, Tuesday 19 January
- Planning for Chippenham, Wednesday 20 January
- Planning for Tidworth and Ludgershall, Wednesday 20 January
- Planning for Malmesbury, Thursday 21 January
- Planning for Amesbury, Thursday 21 January
- Planning for Marlborough, Monday 25 January
- Planning for Bradford on Avon, Monday 25 January
- Planning for Westbury, Tuesday 26 January
- Planning for Salisbury, Tuesday 26 January
- Planning for Devizes, Wednesday 27 January
- Planning for Trowbridge, Wednesday 27 January
- Planning for Melksham, Thursday 28 January
- Planning for Warminster, Thursday 28 January
- Planning for rural areas, Monday 1 February and Tuesday 2 February

[Sign up for an event](#)

[Find out more about the local plan](#)

Gypsy and Traveller Local Plan consultation

The Gypsy and Traveller Local Plan consultation will also take place at the same time, from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021. In line with Government planning policy and legislation, the plan will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

[Find out more about the Gypsy and Traveller Local Plan](#)

Appendix 2

Please see overleaf a transcript of the notification letter sent to all those on the Spatial Planning mailing list requesting postal notification. This copy represents the notification letter sent week commencing 11/01/21 marking the beginning of the consultation.

January 13th 2021

Spatial Planning
Economic Development and
Planning
County Hall
Bythesea Road
Trowbridge
Wiltshire
BA14 8JN

Dear Sir/Madam,

Consultations to inform the Wiltshire Local Plan review and the proposed scope and content of the Gypsies and Travellers Development Plan Document

Consultation on the Wiltshire Local Plan review and the proposed scope and content of the Gypsies and Travellers Development Plan Document is being undertaken over the period from **13 January to the 9 March 2021**.

This notification letter invites you to participate in these consultations and provides details of how you can access documents, particularly if you do not have access to the internet. What follows is a brief summary of each consultation and how to find out more about the consultations.

Wiltshire Local Plan Review

The consultation will enable people to comment and help shape the content of the draft Wiltshire Local Plan Review, which is due for publication towards the end of 2021. This round of consultation builds on earlier engagement with the community and other stakeholders undertaken since 2017.

The published consultation materials include: an emerging strategy for guiding where future development - such as new homes and land for employment - in the period to 2036 will be planned for, including in each of the County's main towns and city; a planning framework for managing development in rural areas, particularly new homes; and the opportunity to provide feedback on how the Council's planning policies can be shaped to address climate change.

In addition, to the main consultation documents, the Council has prepared a number of supporting documents. The consultation documents and supporting documents including information on how to respond are available on the Council's website at:

<https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>.

Alternatively, if you do not have access to the internet and wish to speak to an officer to find out more about the consultation, or request a hard copy of the consultation documents please contact the Council by email spatialplanningpolicy@wiltshire.gov.uk or by telephone 0300 456 0100 and ask to speak to an officer in the Spatial Planning Service.

Representations should focus on the questions asked in the published documents. Representations can be submitted via the Council’s website (link above) or via email to spatialplanningpolicy@wiltshire.gov.uk using the response forms available on the Council’s website, or on request. Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

To support the Local Plan review consultation, the Council is running a series of online events late January and early February 2021 via Microsoft Teams Live Events. Unfortunately, due to the COVID pandemic we are not able to hold face to face events. If you have access to the internet, details of these events and how to register your interest to attend can be found at: [https://www.wiltshire.gov.uk/planning-policy-local-plan-review Council](https://www.wiltshire.gov.uk/planning-policy-local-plan-review-Council) or provided by contacting spatialplanningpolicy@wiltshire.gov.uk, or 0300 456 0100.

Gypsies and Travellers Development Plan Document

We are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

The consultation document and supporting evidence (the Gypsy and Traveller Accommodation Assessment, Opinion Research Services, 2020) has been published on the Council’s website. To view these documents and find out more about the Gypsies and Travellers Plan and how to comment, go to www.wiltshire.gov.uk/planning-gypsy-travellers.

Representations can also be emailed to: spatialplanningpolicy@wiltshire.gov.uk. Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

As with the Local Plan review consultation, if you do not have access to the internet or email, please ring the Council on 0300 456 0100 and ask to speak to an officer within the Spatial Planning Service for further information or to request hard copies of documents.

Yours Faithfully,
.....

Appendix 3

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to residents on 13/01/21 marking the beginning of the consultation.



13 January 2021

The Wiltshire Local Plan and Gypsy and Travellers Plan consultations begin today

The consultation on the Wiltshire Local Plan review starts today, so you can now have your say on where future development – including housing, infrastructure and land for employment – may be built in your area in the next 15 years. The consultation will also look to develop our planning policies to help tackle climate change.

We have to allocate sufficient land to satisfy the county’s housing and employment needs up to 2036, and in this consultation, you will be able to give your feedback on whether the suggested distribution of housing numbers across the county is correct, and which of the proposed development sites are most suitable.

Don’t forget, you can still also sign up for one of our online engagement sessions to find out more about the potential sites in your area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements not covered in the other 15 events.

To find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions, go to www.wiltshire.gov.uk/planning-policy-local-plan-review

In addition, we are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan, go to www.wiltshire.gov.uk/planning-gypsy-travellers

Both consultations end on Tuesday 9 March 2021.

[Find out more](#)

Appendix 4

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to stakeholders on 06/01/21 and 13/01/21.



6 January 2021

Dear Resident

Wiltshire Local Plan review consultation

The consultation into the Wiltshire Local Plan review, and separately the Gypsy and Traveller Local Plan, will run from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021.

Wiltshire Council has to allocate sufficient land to satisfy housing and employment needs up to 2036, and is seeking the views of local communities and stakeholders to see if the suggested distribution of numbers across the county is correct, and which of the proposed sites are most suitable.

Feedback during this review consultation will help to shape the draft Local Plan, which will be finalised later in 2021. It will then be used to guide decisions on whether future planning applications for housing, infrastructure and land for employment can be granted.

As COVID restrictions mean that face-to-face events will not be possible during this review, the council is holding a series of online events for people to find out more about the Local Plan. Each event relates to a particular settlement, and there are also two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

The online events, which will be held from 7pm-8pm on the dates shown are as follows:

- Planning for Calne, Monday 18 January
- Planning for Corsham, Tuesday 19 January
- Planning for Royal Wootton Bassett, Tuesday 19 January
- Planning for Chippenham, Wednesday 20 January
- Planning for Tidworth and Ludgershall, Wednesday 20 January
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- Planning for Amesbury, Thursday 21 January
- Planning for Marlborough, Monday 25 January
- Planning for Bradford on Avon, Monday 25 January
- Planning for Westbury, Tuesday 26 January
- Planning for Salisbury, Tuesday 26 January
- Planning for Devizes, Wednesday 27 January
- Planning for Trowbridge, Wednesday 27 January
- Planning for Melksham, Thursday 28 January
- Planning for Warminster, Thursday 28 January
- Planning for rural areas, Monday 1 February and Tuesday 2 February

[Sign up for an event](#)

[Find out more about the local plan](#)

Gypsy and Traveller Local Plan consultation

The Gypsy and Traveller Local Plan consultation will also take place at the same time, from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021. In line with Government planning policy and legislation, the plan will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

[Find out more about the Gypsy and Traveller Local Plan](#)



Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).

[View this email in your browser](#)



13 January 2021

The Wiltshire Local Plan and Gypsy and Travellers Plan consultations begin today

The consultation on the Wiltshire Local Plan review starts today, so you can now have your say on where future development – including housing, infrastructure and land for employment – may be built in your area in the next 15 years. The consultation will also look to develop our planning policies to help tackle climate change.

We have to allocate sufficient land to satisfy the county's housing and employment needs up to 2036, and in this consultation, you will be able to give your feedback on whether the suggested distribution of housing numbers across the county is correct, and which of the proposed development sites are most suitable.

Don't forget, you can still also sign up for one of our online engagement sessions to find out more about the potential sites in your area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements not covered in the other 15 events.

To find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions, go to www.wiltshire.gov.uk/planning-policy-local-plan-review

In addition, we are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan, go to www.wiltshire.gov.uk/planning-gypsy-travellers

Both consultations end on Tuesday 9 March 2021.

[Find out more](#)



Want to change how you receive these emails?
You can [update your preferences](#) or [unsubscribe from this list](#).

Appendix 5

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to members on 13/01/21 marking the beginning of the consultation.

WILTSHIRE COUNCIL UPDATE

Wiltshire Council

13 January 2021

The Wiltshire Local Plan and Gypsy and Travellers Plan consultations begin today

Dear Members,

The Local Plan review consultation begins today, giving your communities the opportunity to have their say on where future development – including housing, infrastructure and land for employment – may be built in their area for the next 15 years. The consultation will also look to develop our planning policies to help tackle climate change.

Don't forget, starting on Monday, we're also holding a series of online engagement sessions to enable people to find out more about the potential sites in their area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

To find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions, go to www.wiltshire.gov.uk/planning-policy-local-plan-review

In addition, we are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan, go to www.wiltshire.gov.uk/planning-gypsy-travellers

Both consultations end on Tuesday 9 March 2021.

Communications Team
Corporate Services

[Find out more](#)

Appendix 6

Please see overleaf a copy of the notification sent to all those on the Wiltshire Council email newsletter distribution list sent to parish and town councils on 13/01/21 marking the beginning of the consultation.



13 January 2021

The Wiltshire Local Plan and Gypsy and Travellers Plan consultations begin today

The Local Plan review consultation begins today, giving your communities the opportunity to have their say on where future development – including housing, infrastructure and land for employment – may be built in their area for the next 15 years. The consultation will also look to develop our planning policies to help tackle climate change.

Don't forget, starting on Monday, we're also holding a series of online engagement sessions to enable people to find out more about the potential sites in their area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

To find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions, go to www.wiltshire.gov.uk/planning-policy-local-plan-review

In addition, we are also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan, go to www.wiltshire.gov.uk/planning-gypsy-travellers

Both consultations end on Tuesday 9 March 2021.

Communications Team
Corporate Services

[Find out more](#)

Appendix 7

Please see overleaf a copy of the public notice placed within local newspapers during week commencing 11/01/21. This public notice was included within the Wiltshire Times, Salisbury Journal and the Wiltshire Gazette and Herald.

Section 14(1) of the Road Traffic Regulation Act 1984

Notice is hereby given that the Wiltshire Council has made an Order to close temporarily to all traffic: **Downham Mead (Part), Chippenham**; from its junction with Cocklebury Road for a distance of approximately 10 metres in a southerly direction to enable Wales & West Utilities Ltd to carry out gas mains and service replacement. Alternative route: via Downham Mead (unaffected length) – Sadlers Mead – Esmead – Cocklebury Road and vice versa. **The closure and diversion route will be clearly indicated by traffic signs.** This Order will come into operation on 18 January 2021 and the closure will be required until 05 February 2021. It is anticipated that the works will take the stated duration to complete depending upon weather conditions. Access will be maintained for residents and businesses where possible, although delays are likely due to the nature of the works. The Order will have a maximum duration of 18 months. For further information please contact Steve Wilshire at Wales & West Utilities Ltd on 01173 013359.

GYPSIES AND TRAVELLERS DEVELOPMENT PLAN DOCUMENT AND WILTSHIRE LOCAL PLAN REVIEW Planning and Compulsory Purchase Act 2004 (as amended) The Town and Country Planning (Local Planning) (England) Regulations 2012 Regulation 18

Notification of intention to prepare and consult on the content and scope of a Gypsies and Travellers Development Plan Document (DPD) and consultation to inform the Wiltshire Local Plan Review

Gypsies and Travellers DPD

In accordance with Regulation 18 of the Town and Country Planning Regulations 2012, Wiltshire Council is consulting on its intention to prepare a Gypsies and Travellers DPD. The consultation was approved by Wiltshire Council's Cabinet on 13th October 2020. The purpose of this notification is to invite comments on the proposed scope and content of the Gypsies and Travellers DPD. Please note that the scope of the Wiltshire Local Plan Review has been amended to allow for the preparation of the Gypsies and Travellers DPD as a standalone plan.

The proposed scope of the Gypsies and Travellers DPD is to allocate land for travellers in sustainable locations meeting identified permanent and temporary accommodation needs up to 2036, in line with Government planning policy and legislation.

Due to the ongoing restrictions associated with the COVID-19 pandemic and to comply with:

- current Government Guidance (Planning Practice Guidance, Paragraph: 076 Reference ID: 61-076-201200513);
- the Council's Statement of Community Involvement (SCI); and
- Temporary Arrangements put in place alongside the SCI.

There will be no opportunity to view hard copies of the consultation documents at Council offices or libraries, nor will there be public consultation events.

The consultation document and supporting evidence (the Gypsy and Traveller Accommodation Assessment, Opinion Research Services, 2020) will be published on Wiltshire Council's Planning Policy website at: <https://www.wiltshire.gov.uk/planning-gypsy-travellers>. Alternatively if you do not have access to the internet and wish to receive a hard copy of the consultation documents and supporting evidence, please contact the Spatial Planning Service at spatialplanningpolicy@wiltshire.gov.uk or 0300 456 0100.

Bespoke consultation will be carried out with traveller households due to the importance of the spoken word in traveller communities.

If you would like to comment on the proposed scope and content of the Gypsies and Travellers DPD, these should be submitted during the consultation period, running from **Wednesday 13 January to 11:59pm Tuesday 9 March 2021**. Representations received beyond this date may not be considered.

Representations can be emailed to: spatialplanningpolicy@wiltshire.gov.uk. Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

Copies of all comments received will be made available for the public to view, including the name of the stakeholder who submitted the representation. Therefore, your response cannot be treated as confidential. However, the Council will not include any personal addresses or signatures.

Further detail in terms of the timetable for preparing the Gypsies and Travellers DPD is set out in the Council's latest Local Development Scheme July 2020. A copy of the Local Development Scheme can be provided on request using the contact details set out in this notice.

Consultation to inform the Wiltshire Local Plan Review

On Tuesday 1 December 2020 Wiltshire Council's Cabinet agreed the next steps for the Local Plan Review process, including undertaking a round of consultation to enable people to comment and help shape the content of the draft Wiltshire Local Plan Review, which is due for publication towards the end of 2021. This round of consultation builds on earlier engagement with councillors, council partners and the public undertaken since 2017.

The published consultation materials include: an emerging strategy for guiding where growth will be planned for in each of the County's main towns and city; a planning framework for managing development in rural areas; and the opportunity to provide feedback on how the Council's planning policies can be shaped to address climate change.

In addition, to the main consultation documents, the Council has prepared a number of supporting documents, as follows:

- Interim Sustainability Appraisal, Wiltshire Council
- Interim Sustainability Appraisal, Wiltshire Council - Annex I: SA of Alternative Development Strategies for Housing Market Areas (HMAs)
- Interim Sustainability Appraisal, Wiltshire Council - Annex II: SA of potential development sites (reasonable alternatives) at Chippenham, Salisbury and Trowbridge
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Chippenham HMA
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Salisbury HMA
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Swindon HMA
- Formulating Alternative Development Strategies (ADSS) Wiltshire Council - Trowbridge HMA
- Habitats Regulations Assessment Screening Opinion, Land Use Consultants, 2020

- Strategic Flood Risk Assessment (SFRA) Level 1 Study, JBA Consulting, May 2019
- Autumn 2017 Regulation 18 consultation reports (9 reports in total)
- Autumn 2018 Regulation 18 consultation reports (2 reports in total)
- 2019 Regulation 18 consultation reports (5 reports in total)
- Local Transport Review, Atkins, 2020
- Town Centre and Retail Study, Avison Young, December 2020
- Swindon Borough Council & Wiltshire Council Local Housing Needs Assessment, Opinion Research Services, April 2019
- Wiltshire Employment Land Review, Final Report, May 2018
- Swindon and Wiltshire Functional Economic Market Area Assessment (FEMAA), Hardisty Jones Associates, December 2016

Comments on these supporting documents are invited within the consultation period.

Again, due to the ongoing restrictions associated with the COVID-19 pandemic and to comply with:

- current Government Guidance (Planning Practice Guidance, Paragraph: 076 Reference ID: 61-076-201200513);
- the Council's Statement of Community Involvement (SCI); and
- Temporary Arrangements put in place alongside the SCI

There will be no opportunity to view hard copies of the consultation documents at Council offices or libraries.

The consultation documents and supporting documents will be published on Wiltshire Council's Planning Policy website at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation>

Alternatively if you do not have access to the internet and wish to receive a hard copy of the consultation documents and supporting documents, please contact the Spatial Planning Service at spatialplanningpolicy@wiltshire.gov.uk or telephone on 0300 456 0100.

If you would like to comment on the content of the Local Plan Review materials, these should be submitted during the consultation period, running from **Wednesday 13 January to 11:59pm Tuesday 9 March 2021**. Representations received beyond this date may not be considered.

Representations should focus on the questions asked in the published documents. Representations can be submitted via email to: spatialplanningpolicy@wiltshire.gov.uk using the Response Forms available on the Council's website. Alternatively, please send your representations to: Spatial Planning, Economic Development and Planning, Wiltshire Council, County Hall, Trowbridge, BA14 8JQ.

Copies of all comments received will be made available for the public to view, including the name of the stakeholder who submitted the representation. Therefore, your response cannot be treated as confidential. However, the Council will not include any personal addresses or signatures.

To support the consultation, the Council will be running a series of live events during January and early February 2021 via Microsoft Teams Live Events. Details of these events and how to register your interest to attend can be found at: <https://www.wiltshire.gov.uk/planning-policy-local-plan-review> Council or provided by contacting spatialplanningpolicy@wiltshire.gov.uk, or 0300 456 0100.

Further detail in terms of the timetable for preparing the Wiltshire Local Plan Review is set out in the Council's latest Local Development Scheme July 2020. A copy of the Local Development Scheme can be provided on request using the contact details set out in this notice.

Sam Fox

Interim Corporate Director Place and Environment

Town and Country Planning (General Development Procedure) (England) Order 2015

Town and Country Planning (Listed Buildings and Conservation Areas (Amendment) (England) Regulations 2010

The following planning applications are those affecting the setting of a Listed Building, a Conservation Area, a Public Right of Way, or major applications and are available to view on our website. Views relating to the planning applications listed below should be made by **04/02/2021** quoting the reference number. All views expressed regarding a planning application will be considered and placed on a file, which is open to the public.

ASHTON KEYNES - 20/11250/MODPO Aggregate Industries UK Ltd, Cleveland Farm Works, Discharge of Planning Obligation relating to Section 106 agreement for N/89/2844; **BIDDESTONE - 20/10605/FUL** The Former Biddestone Arms, The Green, Farm 2 Houses, Erection of 4 Dwellings; **CALNE - 20/10137/FUL & 20/10954/LBC** Calne Free Church, Church Street, Rebuilding of wall/underpinning of buttresses to church hall/repair wall; **20/10573/FUL & 20/11630/LBC** St Marys School, Curzon Street, Erection of pavilion; **20/10611/LBC** 11 High Street, Removal of Signage/ATM; **CALNE WITHOUT - 20/10600/LBC** Lysley Arms, Pewsham, Internal/external alterations/refurbishments; **CASTLE COMBE - 20/10355/FUL** Park Lane Cottage, 2 Park Lane, Extension; **CHARLTON - 20/10311/LBC** 7 Charlton Park House, Charlton Park, Wood burning stove/flue liner; **CHERHILL - 20/10719/FUL & 21/00004/LBC** Tudor Thatch, The Street, Yatesbury, Timber mansard; **CHIPPENHAM - 20/10378/FUL** 53 The Causeway, Change of use of ground floor to residential; **DEVIZES 20/07136/LBC & 20/07137/ADV** 5 The Brittox, Barber pole/signage; **GRITTLETON - 20/09710/FUL & 20/11206/LBC** Holly Tree Cottage, Sevington, Extension/alterations; **20/10382/FUL & 20/11268/LBC** Woodlands, The Street, Summerhouse; **20/10607/FUL & 20/11380/LBC** Ryleys Farmhouse, Orangery extension/car port; **KINGTON LANGLEY - 20/09635/FUL & 20/11364/LBC** Sundial House, Swindon Road, Internal/external alterations; **MALMESBURY - 20/10587/LBC** Avon Cottage, 13 Back Hill, Alterations/install central heating/external landscaping; **MARLBOROUGH - 20/10118/LBC** Memorial Hall Forecourt, Marlborough College, Bath Road, Replacement pavers/Drainage works; **20/10733/FUL & 20/11656/LBC** 3A Herd Street, Extension/alterations; **NETTLETON - 20/10429/LBC** Green Cottage, Repair/Replacement of Chimney Stack; **ROYAL WOOTTON BASSETT - 20/11655/FUL** Land at Brynards Hill, Erection of 61 Dwellings; **SEEND - 20/10746/LBC** 1 & 2 Weavers Cottages, High Street, Replacement windows; **WEST LAVINGTON - 20/10526/FUL** Wyneshore House, 2 White Street, Formation of 1 bed apartment & carport/garage/workshop; Email: developmentmanagement@wiltshire.gov.uk

Wiltshire Council

Appendix 8

Please see overleaf a copy of the press release issued 18/12/20: “*Sign up to online events and have your say about where future developments should take place in Wiltshire*”. This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

[Home](#) > [News and communications](#)

Sign up to online events and have your say about where future developments should take place in Wiltshire

Have your say on the Wiltshire Local Plan

Published 18 December 2020



Wiltshire communities, businesses, town and parish councils and other local stakeholders are invited to have their say on the possible sites that may be marked for growth in their area.

Wiltshire Council has to allocate sufficient land to satisfy housing and employment needs up to 2036, and is seeking the views of local communities and stakeholders to see if the suggested distribution of numbers across the county is correct, and which of the proposed sites are most suitable.

Feedback during this review consultation will help to shape the draft Local Plan, which will then be consulted on later in 2021. The Local Plan will be used to guide decisions on whether future planning applications for housing, infrastructure and land for employment can be granted.

The council will launch the consultation into its Wiltshire Local Plan review, and separately its Gypsy and Traveller Local Plan, from Wednesday 13 January 2021 until 11:59pm on Tuesday 9 March 2021.

As COVID restrictions mean that face-to-face events will not be possible during this review, the council is holding a series of online events for people to find out more about the Local Plan. Each event relates to a particular settlement, and there are also two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

The online events, which will be held from 7pm-8pm on the dates shown are as follows:

Sign up for the online events [here](#), and you will be sent a link to your chosen online meeting in advance of the meeting. The consultation documents will be posted here before the consultation begins: www.wiltshire.gov.uk/planning-policy-local-plan-review.

Cllr Toby Sturgis, Cabinet Member for Planning, said: "The Wiltshire Local Plan review consultation is an important opportunity for people to have their say on the future of possible areas of growth in their area before proposals are finalised in the draft Local Plan, later in 2021.

"We would usually hold a series of face-to-face engagement events for the Local Plan review, but we are unable to do so at present because of the COVID-19 pandemic. Therefore, I would urge as many people as possible to sign up for their local online event to find out more.

"Anyone who can't make their local online event will be able to view all the relevant documents online and complete the online consultation to have their say.

"As well as potential developments, the Local Plan review consultation also takes into account the importance of climate change, and this will also form a key part of the consultation.

"If anyone has any queries, they can speak to one of our planning officers about the Local Plan review."

Once this consultation is complete, a draft Local Plan will be produced, and people will be given another opportunity to take part in a consultation in late 2021. The plan will then be submitted to the Secretary of State in the third quarter of 2022, before it is examined by an inspector in late 2022, ahead of final adoption in 2023.

During the same consultation period, from Wednesday 13 January until Tuesday 9 March, the council is also consulting on the Gypsy and Traveller Local Plan.

In line with Government planning policy and legislation, the plan will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

This consultation will help to shape a draft plan, which the council will then consult on again in autumn 2021, before the plan is submitted to Government, ahead of public examination and then adoption of the plan in late 2022. To find out more about the Gypsy and Traveller Local Plan, people can go to www.wiltshire.gov.uk/planning-gypsy-travellers.

Explore the topic

Appendix 9

Please see overleaf a copy of the press release issued 13/01/21: “*Consultation into the Wiltshire Local Plan begins today*”. This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

Consultation into the Wiltshire Local Plan begins today

People throughout Wiltshire can now have their say on the Local Plan review, and the Gypsy and Travellers Plan, as the consultations begin today.

Published 13 January 2021



People throughout Wiltshire can now have their say on the Local Plan review, and the Gypsy and Travellers Plan, as the consultations begin today.

The Local Plan consultation is the perfect opportunity for residents, business and other Wiltshire stakeholders, such as town and parish councils, to share their views on where future development - including housing, infrastructure and land for employment - may be built in their area for the next 15 years.

Wiltshire Council has to allocate sufficient land to satisfy the county's housing and employment needs up to 2036, and in this consultation, people will be able to give their feedback on whether the suggested distribution of housing numbers across the county is correct, and which of the proposed development sites are most suitable. It is also looking to develop its planning policies to help tackle climate change.

Cllr Toby Sturgis, Cabinet Member for Planning, said: "The Local Plan sets out where development, such as housing, may be built in Wiltshire up until 2036, so it's important that people use this opportunity to take part in the consultation and let us know what they think.

"Although there will be another chance to comment on the draft Local Plan later in the year, this is a key stage in the plan-making process, as it gives communities and businesses the opportunity to let us know what they think about proposed development in their area before the Plan is finalised for consultation and examination. We also want people's thoughts on how we can tackle climate change through planning.

"I'd encourage anyone with an interest in development in their community, whether it's a town or village, to take part in this consultation process, sign up for our online engagement events to find out more, and then submit their comments."

The council is also holding a series of online engagement sessions to enable people to find out more about the proposals their area. There are 17 events; 15 that each relate to a particular settlement, and two events for rural areas, which include all other Wiltshire villages and settlements that are not covered in the other 15 events.

Find out more about the Local Plan review, view documents, have your say, and sign up for one of the online engagement sessions here: [Local Plan Review](#).

In addition, the council is also consulting on the proposed scope and content of the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. Find out more about the [Gypsies and Travellers plan](#).

Both consultations end on Tuesday 9 March 2021.

Appendix 10

Please see overleaf a copy of the press release issued 10/02/21: *“More than 1,300 people attend Local Plan review engagement sessions as consultation continues”*. This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

More than 1,300 people attend Local Plan review engagement sessions as consultation continues

The last of Wiltshire Council's online engagement sessions to explain more about the ongoing Local Plan review consultation has ended, with 1,321 people joining the events.

Published 10 February 2021

The logo for Wiltshire Council, featuring the text "Wiltshire Council" in white on a green rectangular background. Below the text is a white curved line that resembles a stylized horizon or a wave.

The sessions were an opportunity for people to find out more about the proposals in their local area, and to ask questions about the plans and the consultation. In total, the council held 17 events, 15 related to towns and the city in the county, and two on plans for rural areas.

Although the online engagement events have now finished, people can still view the presentations from the events, view all the consultation documents, and have their say on the consultation, which ends on 9 March. All the information, including how to submit comments, is available at: www.wiltshire.gov.uk/planning-policy-local-plan-review-consultation.

Anyone without internet access can call the council on 0300 456 0100 to speak to the Spatial Planning team to find out more about the plan or to request printed copies of documents. People can also make submissions to the consultation by post.

CLlr Toby Sturgis, Cabinet Member for Planning, said: "As COVID restrictions mean that we couldn't hold face to face engagement events, this was the first time we have tried these online engagement sessions for a large scale consultation, and they have been a real success.

"The number of attendees to these online sessions has exceeded the numbers we would usually get at similar face to face events, and as people are able to ask questions anonymously online, we have had much greater open engagement.

"The people who attended the sessions made some very interesting and valuable points about the Local Plan, and all questions from the events will be answered and published on our website in the next two weeks, in plenty of time before the end of the consultation.

"The consultation is open until 9 March, and we want to hear from as many people in the county as possible, so please do take some time out to have your say. Feedback we receive at this stage will help to shape the next 15 years of development in Wiltshire, so it is really important that people let us know what they think."

This consultation is taking place alongside one on the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036. To find out more about the Gypsies and Travellers Plan consultation, which also closes on 9 March, and to have their say, people should go to www.wiltshire.gov.uk/planning-gypsy-travellers.

Appendix 11

Please see overleaf a copy of the press release issued 02/02/21: *“There is still time to take part in the Wiltshire Local Plan review consultation”*. This press release was placed on the Wiltshire Council website, promoted on social media, and sent to a variety of sources including all Wiltshire Council members, Town & Parish councils along with local/regional and some national media.

There is still time to take part in the Wiltshire Local Plan review consultation

There are now less than two weeks to take part in the Wiltshire Local Plan review consultation, and for people to have their say on where future developments may be built in the county in the next 15 years.

Published 26 February 2021

Business and economy

The consultation closes on Tuesday 9 March, and although there will be a further consultation later in the year, people should take this opportunity to have their say about the future of housing, infrastructure and land for employment in their area.

Cllr Toby Sturgis, Cabinet Member for Planning, said: "We have had an excellent response to the consultation so far, with more than 500 submissions, but with less than two weeks to go until the closing date, we're asking anyone that hasn't already responded to do so by 9 March.

"All the Local Plan documents and an online form for people to have their say are on our website, and anyone without internet access who wants to have their say can contact our Spatial Planning team to discuss the plan in their area and submit their comments.

"People can call 0300 456 0100 to speak to one of our officers, and if they don't have access to the internet, they can also request printed copies of the documents and can write to us to submit their comments.

"It's really important that people take this opportunity to let us know what they think, as feedback we receive will help to shape the next 15 years of development in Wiltshire."

All the information on the Local Plan, including all documents, write ups of the engagement events, and how to submit comments, is available at [Local Plan Review consultation](#).

Written submissions can be sent to: Local Plan review consultation, Spatial Planning, County Hall, Bythesea Road, Trowbridge BA14 8JN.

This consultation is taking place alongside the Gypsies and Travellers Plan, which will look to allocate land for travellers in sustainable locations to meet their permanent and temporary accommodation needs up until 2036.

To find out more about the Gypsies and Travellers Plan consultation, which also closes on 9 March, and to have their say, people should go to [Gypsy and Travellers - planning](#).

Appendix 12:

Please see overleaf a copy of the Microsoft Forms consultation form used for the Gypsies and Travellers DPD Regulation Consultation undertaken between 13 January and 9 March 2021.

Planning for Wiltshire's Gypsy and Traveller Community

Wiltshire Council is preparing a plan to address the accommodation needs of the Gypsy and Traveller communities in Wiltshire and is seeking your views to inform the content of the plan.

This form is split into 9 short sections:

- Section 1: Personal details
- Section 2: Client details (if not applicable you'll be directed to section 3)
- Section 3: Planning for Wiltshire's Gypsy and Traveller Communities (plan content and objectives)
- Section 4: Permanent accommodation requirements
- Section 5: Emergency stopping sites
- Section 6: Proposed approach to meeting accommodation needs
- Section 7: Site assessment criteria for permanent sites
- Section 8: Site assessment criteria for emergency stopping sites
- Section 9: Further comments

You must pass through all the sections and click 'submit' for your comments to be registered'

Time to complete the form varies depending on the detail contained within each response.

ONCE STARTED THIS FORM MUST BE COMPLETED IN ONE SESSION OR YOUR RESPONSE WILL BE LOST.

The form will not save partially complete responses. You do not have to answer all the questions, however you will need to continue clicking 'next' and click 'submit' at the end of the form.

...

Personal details

Please enter your personal details below.

1

First name *

Enter your answer

2

Last name *

Enter your answer

3

Email address *

If you do not have an email address, please enter 'no email'. Without this information Wiltshire Council may not be able to update you on the progress of the Gypsy and Traveller DPD.

Enter your answer

4

Organisation

Enter your answer

5

Postal address

Enter your answer

6

Are you responding on behalf of someone else/a client? *

Yes

No

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Planning for Wiltshire's Gypsy and Traveller Community

Planning for Wiltshire's Gypsy and Traveller Communities

7

Do you have any comments on what the plan should contain?

The plan will identify accommodation needs for travellers to 2036. It will identify sites, broad locations for growth and review Core Policy 47 'Meeting the needs of Gypsies and Travellers' of the Wiltshire Core Strategy.

Enter your answer

8

Do you agree with the proposed plan objectives? Please explain your answer.

The proposed plan objectives are as follows:

Objective 1: Meeting needs for permanent accommodation:

To meet identified accommodation need for gypsy and traveller pitches and travelling showpeople plots to 2036 through site allocations or broad locations for growth; and to provide a framework for assessing proposals.

Objective 2: Making provision for temporary accommodation:

To provide three emergency stopping sites for temporary accommodation.

Objective 3: Site location:

To provide well-designed sites in keeping with their surroundings, and in appropriate and sustainable locations with good access to facilities and services, which respect both the interests of the settled and traveller communities.

Enter your answer

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Planning for Wiltshire's Gypsy and Traveller Community

Permanent accommodation requirements

The new 2020 Gypsy and Traveller Accommodation Assessment (GTAA) is based on interviews with traveller households on sites/yards in Wiltshire. It identifies accommodation needs for households that meet the definition of gypsies and travellers and travelling showpeople; households who do not; and households that could not be determined.

Permanent pitch requirements of gypsy and traveller households meeting the planning definition:

- 76 pitches are required in the first 5 years for these households, totalling 132 up to 2036 from household formation. It is proposed that this need is addressed in the plan.

Accommodation need for gypsy and traveller households that did not meet the planning definition:

- 21 pitches are required for the first 5 years for these households, totalling 78 up to 2036 from household formation. It is proposed that this need is addressed in the plan.

Permanent pitch requirements of undetermined gypsy and traveller households:

- 14 pitches are required for the first 5 years for these households, totalling 29 up to 2036 from household formation. The GTAA recommends this need is addressed through the planning application process as it is not possible for the plan to allocate land for undetermined need.

Permanent plot requirements of showpeople households meeting the planning definition:

- 10 plots for showpeople meeting the planning definition are required in the first 5 years totalling 12 plots up to 2036 from household formation.

Permanent plot requirements of undetermined showpeople households:

- No pitches are anticipated to be required for the first 5 years with 2 plots up to 2036 from household formation. The GTAA recommends this need is addressed through the planning application process as it is not possible for the plan to allocate land for undetermined need.

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Do you support the GTAA findings?

Please explain your answer.

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Planning for Wiltshire's Gypsy and Traveller Community ...

Emergency stopping sites

The Gypsy and Traveller Accommodation Assessment (GTAA) proposes that we provide three emergency stopping sites in the north, west and south of Wiltshire to meet temporary accommodation needs. They should offer temporary stay for transient travellers and assist in managing unauthorised encampments. No set number of pitches are proposed within the GTAA.

10

Do you agree or disagree with the proposal to provide three emergency stopping sites?

Please explain your answer.

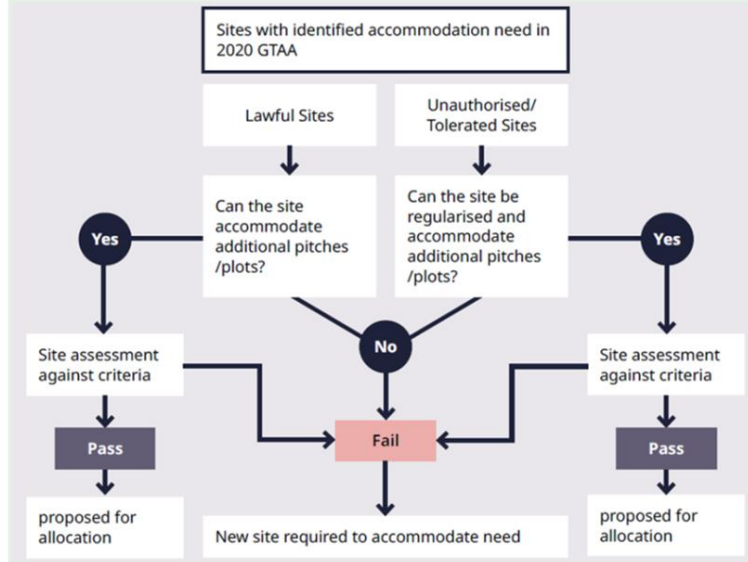
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Proposed approach to meeting accommodation needs

Accommodation needs must be met on authorised pitches and plots. Commonly there is a desire for households to remain on a family site. It is therefore proposed to intensify existing lawful sites in the first instance to meet requirements. Unauthorised sites will be assessed to see if they can be regularised through an allocation in the plan. We anticipate most of the first five year requirements could be met in this way. Any residual requirements are proposed to be met through new site allocations or by way of identifying broad locations for growth in the plan. It is proposed that new sites for travellers will be small and offer the opportunity for family-owned pitches and plots. Feedback from travellers received before emphasised that this is preferred to large sites. New sites must comply with the site assessment criteria (next section of this form).



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Do you agree with the proposed approach to meeting accommodation needs?

Please explain your answer.

Enter your answer

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Site assessment criteria for permanent sites

We would welcome your views on the criteria and the changes we are proposing, outlined below.

Proposals for new gypsy and traveller pitches or travelling showpeople plots/yards will only be granted where there is no conflict with other planning policies and where no barrier to development exists. New development should be situated in sustainable locations. Where proposals satisfy the following general criteria, they will be considered favourably:

- i. Priority must be given to effective use of previously developed land over greenfield land. This can include land last occupied by farmyards.
(New criterion: In the interest of protecting undeveloped land. This new criterion does not preclude the use of greenfield sites but would require evidence that previously developed land has been considered.)
- ii. No significant barriers to development exist in terms of flooding, poor drainage, poor ground stability or proximity to other hazardous land or installation where conventional housing would not be suitable.
- iii. It is served by a safe and convenient vehicular and pedestrian access. The proposal should not result in significant hazard to other road users.
- iv. The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. Where possible, sites should connect to mains.
(Reason: To ensure that wherever possible, mains connections are achieved in the interest of sustainable development.)
- v. The site must also be large enough to provide adequate vehicle parking, including circulation space, along with residential amenity and play areas.
- vi. It is located in, or within three kilometres to, settlements that offer a range of local services and community facilities, in particular schools and essential health services.
(Reason: Our evidence shows that sites which were granted permission, and those that were subject to appeal decisions, predominantly fall within three kilometres of a primary school and GP surgery. The proposed change would clarify what constitutes a reasonable distance.)
- vii. It will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties and is sensitively designed to mitigate any impact on its surroundings.
- viii. Adequate levels of privacy should be provided for occupiers.
- ix. Development of the site should be appropriate to the scale and character of its surroundings and existing

viii. Adequate levels of privacy should be provided for occupiers.

ix. Development of the site should be appropriate to the scale and character of its surroundings and existing nearby settlements.

x. The site should not compromise a nationally or internationally recognised designation nor have the potential for adverse effects on river quality, biodiversity or archaeology.

In assessing sites for travelling showpeople or where mixed-uses are proposed, the site and its surrounding context are suitable for mixed residential and business uses, including storage required and/or land required for exercising animals, and would not result in an unacceptable loss of amenity and adverse impact on the safety and amenity of the site's occupants and neighbouring properties.

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Do you agree with the proposed criteria?

Please explain your answer.

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Site assessment criteria for emergency stopping sites

The approved Emergency Stopping Place Strategy includes the following assessment criteria to find suitable sites:

- i. Sites should avoid any adverse impact on local/national designations (such as conservation areas and Areas of Outstanding Natural Beauty). Sites should avoid any hazardous areas (such as flood zones, contaminated land).
- ii. The site must meet space requirements for internal road(s) and parking and circulation space, and fire safety standards. The site should have additional space for facilities such as waste disposal
- iii. The site should be near or adjacent to key travelling routes identified in the GTAA.
- iv. The site should not have a detrimental impact on the safe and efficient operation of the strategic/highway road network, including junctions and land within the ownership of Highways England and/or Wiltshire Council required for operational purposes.
- v. The candidate site must be serviced by an independent vehicular access point that adheres to the Highway Authority's guidance and standards in terms of safe entry and egress. The road to and from the site must be of sufficient quality and size to enable access onto and off the site by heavy vehicles such as trailers.
- vi. Access to candidate sites should avoid the need to use local roads within industrial areas, recognised commercial areas or housing areas. The site should not give rise to visual impacts or pollution on surrounding land uses and other receptors. Space for a clear barrier around the site is required to prevent unauthorised extension to the site
- vii. Brownfield land is preferred over greenfield land. Where no brownfield land is available, greenfield land of poor agricultural quality (Grade 3b or poorer) is preferred.
- viii. All routes for vehicles on the site, and for access to the site, must allow easy access for emergency vehicles and safe places for turning vehicles.
- ix. The ease of commitment to bringing sites forward and the timing of land release.

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Do you agree with the proposed selection criteria for emergency stopping sites?

Please explain your answer.

Enter your answer

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Further comments

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If you have any further comments you wish to make, please detail them below.

Enter your answer

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* Required

Keeping informed

15

Do you wish to be notified of future updates relating to planning policy? *

Clicking yes will add you to the planning policy contact database. This will mean you are kept informed of any future planning policy notifications including Gypsy and Traveller planning policy updates and consultations.

Further information on how the Spatial Planning Department treats your personally identifiable information can be found by reading the privacy notice available via the link below:

<https://www.wiltshire.gov.uk/planning-privacy-notice>

Here you will also find information about how and why your data may be processed and your rights under the Data Subject Information Notice section further down the page.

Yes

No

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Submit


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Planning for Wiltshire's Gypsy and Traveller Community

 Thanks!

Thank you for your feedback.

The outcomes from this consultation will now be taken into account and utilised to help plan for Wiltshire's gypsy and traveller community.

[Submit another response](#)

[Create my own form](#)

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Appendix 13

Please see overleaf a copy of the leaflets sent as part of the Gypsies and Travellers DPD Regulation Consultation undertaken between 13 January and 9 March 2021.

New Gypsies and Traveller Plan - Consultation

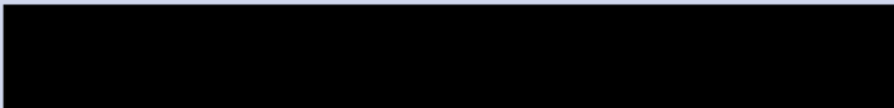
Wiltshire Council is working on a new Gypsies and Travellers Plan. This Plan will identify land to meet the accommodation needs of travellers in Wiltshire up to 2036.

We are now inviting comments on what the Plan should contain. You can view the document, and comment here until 9 March 2021: www.wiltshire.gov.uk/planning-gypsy-travellers

Gypsy and Traveller Accommodation Assessment

The Plan is informed by a pitch need assessment that was carried out by Opinion Research Services (ORS) on our behalf in 2019 - 2020. In February, ORS will contact households with an identified need to discuss this further.

If you have any questions, or would like hard copies of the above, you can contact us weekdays between 9am and 5pm:



Email: spatialplanningpolicy@wiltshire.gov.uk

We look forward to hearing from you.

Wiltshire Council

New Gypsies and Traveller Plan – Consultation Reminder

We recently informed you that we are working on a new Gypsies and Travellers Plan. This Plan will identify land to meet the accommodation needs of travellers in Wiltshire up to 2036.

There is still time to comment on what the Plan should contain. You can view the document, and comment here until 9 March 2021: www.wiltshire.gov.uk/planning-gypsy-travellers

Gypsy and Traveller Accommodation Assessment

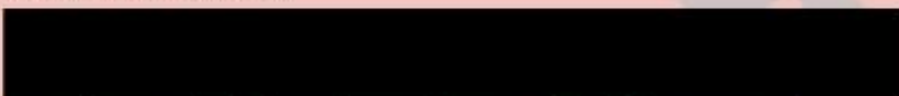
The Plan is informed by a pitch need assessment that was carried out by Opinion Research Services (ORS) on our behalf in 2019–2020. Due to COVID, ORS will no longer be directly contacting households during February.

If you have any questions or want to find out more about the consultation, please contact the council or ORS on:

ORS



Wiltshire Council



Email: spatialplanningpolicy@wiltshire.gov.uk

We look forward to hearing from you.

Wiltshire Council

Appendix 14

Please see overleaf a copy of the telephone template used for the Gypsies and Travellers DPD Regulation Consultation undertaken between 13 January and 9 March 2021.

Telephone Log Template

	Detail	Action?
Call date		
Call time		
Call duration (approx.)		
Caller's Name		
Caller's Telephone number		
Caller's address (if provided)		
Officer dealing with call		
Main points discussed		
Accommodation need?		
Previous engagement with ORS?		
To be passed on to ORS for assessment?		
Has the caller agreed to this?		
Has the caller understood that we will keep a record of the conversation with details redacted?		
Any follow ups needed?		
Anything else?		

Appendix 15

Appendix 15 documents all verbatim representations submitted as part of the Gypsies and Travellers DPD Regulation Consultation undertaken between 13 January and 9 March 2021.

Rep ID: 1	
Consultee code: General Public	Consultee Organisation (if applicable): N/A
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
<p>It appears that when a site is allocated there are no restrictions on what travellers can do on the site. There also appears to be no guidelines and compliances on how the site has to be maintained. [REDACTED] This cannot be acceptable. I would like to see set guidelines to how the site must be maintained. It should be clear of rubbish and kept clean and tidy. This should be inspected on a regular basis to make certain that all standards are being met. I do see a few sites with a small number of caravans that are kept very neat and tidy. This should be set as standard for all sites.</p>	
Do you agree with the proposed plan objectives? Please explain your answer.	
[REDACTED]	
Do you support the GTAA findings?	
[REDACTED]	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

[REDACTED]
Do you agree with the proposed approach to meeting accommodation needs?
Yes
Do you agree with the proposed criteria?
Green field areas should not be included. There is enough unused land in urban areas in Wiltshire that could be used.
Do you agree with the proposed selection criteria for emergency stopping sites?
As per my previous answer
Further comments
[REDACTED] There has to be restrictions and clauses set to how a property or site is maintained. My other concern is that we are encroaching on more and more green field areas. [REDACTED] and more sites are springing up all around us. We have to keep some countryside free from any sort of development, [REDACTED].

Rep ID: 2	
Consultee code: General Public	Consultee Organisation (if applicable): nil
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
I strongly oppose any land given to Gypsies or Travellers.	
Do you agree with the proposed plan objectives? Please explain your answer.	
No	
Do you support the GTAA findings?	
No	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

I disagree. [REDACTED]
Do you agree with the proposed approach to meeting accommodation needs?
No [REDACTED]
Do you agree with the proposed criteria?
No. [REDACTED]
Do you agree with the proposed selection criteria for emergency stopping sites?
No [REDACTED]
Further comments
[REDACTED]

Rep ID: 3	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Besides the current details, why not a charging scheme so the Gypsy and traveller community pay a fair share towards the site costs, and an obligation for cleaning/tidiness	
Do you agree with the proposed plan objectives? Please explain your answer.	
Agree with 1 -3, would add Objective 4: total costs of accommodation provision (and all services, utilities, and police/community charges) met by charges on those using the site	
Do you support the GTAA findings?	
I assume GTAA know more than me ...	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
Yes - as long as the users are charged for their use.
Do you agree with the proposed approach to meeting accommodation needs?
In principle yes. But in principle, I'd also object to unauthorised sites, esp. those who have broken regulations to become established, being allowed to remain or expand with full local consultation & agreement, and reparation for any previous or existing failings.
Do you agree with the proposed criteria?
What is the criteria for vii - 'amenity of neighbouring properties'. Shouldn't this be nearby or local rather than just 'neighbouring'. What about disruption, noise, other aspects for a new or expanded community in the locale? Or is that not a requirement?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
I have seen some sites that fit in well with neighbours and locals, and others that cause endless aggravation and disturbance. How will Wilts CC ensure site users -whether short or long term - do not cause undue disruption to surrounding area? And what controls or options are open to the council, or local residents if the site does cause disruption?

Rep ID: 4	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
It should contain a location that is secure and monitored 24/7 for the safety of the gypsies and travellers.	
Do you agree with the proposed plan objectives? Please explain your answer.	
No. The sites should be provided with a cost given to any gypsies or travellers stay. A time limit should be placed on anyone staying. No permanent location should be provided for non-UK persons.	
Do you support the GTAA findings?	
No, I do not. Everyone should be placed on a waiting list and allocated a location or accommodation when they have proven a viable income and a visa if non-UK passport holder.	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
Disagree. There must be a number placed against how many pitches are provided.
Do you agree with the proposed approach to meeting accommodation needs?
Yes
Do you agree with the proposed criteria?
Yes.
Do you agree with the proposed selection criteria for emergency stopping sites?
Yes.
Further comments

Rep ID: 5	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
<p>The plan should take into consideration the fact that in Royal Wootton Bassett that the road system cannot cope with existing traffic and so any addition would be a disaster.</p> <p>The exiting volume and type of traffic travelling down Noremarsch Road, Royal Wootton Bassett has so increased it has already lead to reduction in our house prices and indeed we have been unable to sell directly because of this problem so any additional traffic could potentially lead to even lower prices.</p> <p>We already suffer in Royal Wootton Basset from too many new properties with no additional Healthcare service and poor road infrastructure.</p> <p>Before anything new, serious work should be done on providing a ring road around Royal Wootton Bassett.</p> <p>There should be full consideration as to whether there are sufficient school places for all age groups as this is a small town there is limited availability of new jobs for any additional people.</p>	
Do you agree with the proposed plan objectives? Please explain your answer.	

In principle yes however this has always been a very emotive subject and so residents' comments should be taken seriously. Most people object to gypsy and traveller pitches and travelling show people plots because of the mess and disruption it causes. With regards to objective 3 -

- A suggested site would be in the B4005, Brimble Hill at the site of the 'Old Oak House' opposite the Burderope site. I appreciate that it was NHS property but I have lived in the area for many years and at first there was a derelict building and now that has been pulled down and there is unused, valuable land. It's close to 2 towns for services and on an existing road and would seem to be a possible site.

- A second suggested site would be on the Cheney Manor Industrial Estate, Swindon SN2 2PN where there are numerous derelict buildings which are an eyesore, and it is a waste of valuable space.

Do you support the GTAA findings?

Yes and no. The number for one plot seem very high. If any plot is allocated then there should be strict adherence to keeping the site perfectly clear of rubbish and well presented, not a tip.

You should ensure that any site chosen will NOT impact on the house prices of existing properties, impact on the view, or general approach of any existing properties. They should not be allowed to remove trees or greenery as we require that to be kept EVERYWHERE for the environment and also the wildlife. Additional healthcare provision is provided as existing healthcare is insufficient at present. Additional school places may be required and those are at a premium already.

Do you agree or disagree with the proposal to provide three emergency stopping sites?

It depends where they are. They should NEVER be on the outskirts of an existing town or village because people are not able to object and that is unfair. The limitation of time to stay at an emergency site should be no longer than 4 weeks maximum as major damage can be done to the environment, as we have seen in the past, and also the cost of cleaning the site afterwards because expensive and it seems unfair that the Council Tax payers have to carry that weight of those bills.

Do you agree with the proposed approach to meeting accommodation needs?

In principle but who will decide whether the sites pass or fail? This should not just be council but an open meeting where everyone can be given an opportunity to comment.

Do you agree with the proposed criteria?

The points are far too general. You have to consider the real, and I mean real impact on existing home and business owners..

<p>The parking should be agreed only on the basis of vehicles that are road worthy and safe We have all seen some of theunsightly vehicles that can be parked and indeed left when the site is vacated. Who is paying for all this gypsy's/ travellers pay Council Tax. It is unfair for exiting resident and business to have to pay an increased tax to accommodate this.</p>
Do you agree with the proposed selection criteria for emergency stopping sites?
Same comments as point 12
Further comments
<p>I don't understand why there has to be emergency sites at all. There should be a number of fixed sites marked across the country where people who wish to 'travel' can apply to park up and or set up home. They should have to pay a Council Tax and a rent for being on the site and obviously pay for the utilities. No one has mentioned about healthcare and schools and this is important. The other factors which have to be considered is the possible effect on the environment.</p>

Rep ID: 6	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
<p>Could I suggest please, the addition of emergency caravan/pitches being made available to boaters, who are a facet of this community with potential emergency need through incidents such as sinking or fire. Many lack support networks and share both the physical and mental health inequalities of this group having no fixed abode.</p>	
Do you agree with the proposed plan objectives? Please explain your answer.	
<p>Absolutely, I feel this is a plan which balances the needs of both traditional 'settled' communities while championing equality and going sympathetic consideration of the needs of travelling people. I know some will never be pleased with any plan which places obligation as well as providing benefits, but i feel this provides much in compensation for lesser tolerance of unauthorised occupancy.</p>	

Do you support the GTAA findings?
Yes
Do you agree or disagree with the proposal to provide three emergency stopping sites?
Agree
Do you agree with the proposed approach to meeting accommodation needs?
Yes I agree and feel this balances the needs of existing communities and sensibly provides for future anticipated need
Do you agree with the proposed criteria?
Yes
Do you agree with the proposed selection criteria for emergency stopping sites?
Agree
Further comments

Rep ID: 7	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
[REDACTED] The plan seems instead to accept that travellers are a permanent and growing element of society. [REDACTED]	
Do you agree with the proposed plan objectives? Please explain your answer.	
[REDACTED] I do not agree with any of the objectives.	
Do you support the GTAA findings?	
No [REDACTED]	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
No, taking this measure to accommodate travellers' needs represents entirely the wrong approach.
Do you agree with the proposed approach to meeting accommodation needs?
As stated above, [REDACTED]
Do you agree with the proposed criteria?
No, for the reasons stated above.
Do you agree with the proposed selection criteria for emergency stopping sites?
No, for the reasons stated above.
Further comments

Rep ID: 8	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
<p>1 & 2 No I do not agree. This is a residential area and area of beauty. Gypsy and traveller accommodation will devalue the area and increase rubbish, waste, and congestion on the already narrow road. Causing significant traffic issues.</p> <p>3 - No I do not agree. As stated above this will not keep in with the local surrounding. There is not good access to facilitates or services. Access is a small, narrow road with passing places. Increasing traffic and parking will cause significant problems to the local area.</p>	

Do you support the GTAA findings?
No. Do not agree that this provision is needed in this area. The increase in residents temporary or permanent will impact the area, safety of ours, increase in crime and impact on road use.
Do you agree or disagree with the proposal to provide three emergency stopping sites?
Disagree.
Do you agree with the proposed approach to meeting accommodation needs?
No. So if Gypsies and travellers pick a location of their choosing and then a 'site assessment' is made and it passes this will be made a permanent site. Basically they can pick and choose wherever they would like to live. Most people have to save money for years to be able to choose to live in a safe, beautiful community like Bradford-on-Avon. This would make the are unsafe, increase population due to increase in population and devalue the area.
Do you agree with the proposed criteria?
No. Point ii- local issues with flooding and drainage due to the high clay levels in the area. iii - Narrow road access. Not safe for extra vehicles or pedestrians. This would lead to a significant hazards for local people.V - proposed area isn't large enough and access is poor. vi - resources in the area are already stretched. Local school oversubscribed. [REDACTED] Vii- huge impact on local landscape. Impact value of local property and beautiful area.
Do you agree with the proposed selection criteria for emergency stopping sites?
No as previously stated. Roads in the area are narrow and not able to manage
Further comments

Rep ID: 9	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Beyond meeting the legal requirements and obligations, the plan should be written using positive and inclusive tone and language.	
Do you agree with the proposed plan objectives? Please explain your answer.	
Yes - I agree with the objectives. These need to be explained to settled communities in different ways in different parts of the County. The south had very bad experiences of New Age Travelers in the 1980's and old prejudices die hard. Ironically the south has Gypsy and Romany families and some Irish travellers, who have been here for over sixty years. We are used to them - so are schools, health services and local authorities and the police and they are used to settled people. The north has tended to be harsher and more aggressive - especially one MP.	

Do you support the GTAA findings?
Yes. The need for permanent pitches with basic facilities is often misunderstood - or resented - by the settled population, including Councillors and MPs. Wiltshire Council can help to change this.
Do you agree or disagree with the proposal to provide three emergency stopping sites?
I agree. But is three enough?
Do you agree with the proposed approach to meeting accommodation needs?
Yes. It is professional and sensitive.
Do you agree with the proposed criteria?
Yes, I agree. However, these criteria are tougher than previous ones and enforcement may technically be easier (the letter of the law etc.) but in practice more difficult. Wiltshire Council, Wiltshire Police and the Diocese of Salisbury Chaplain for Gypsies and Travelers will need a coordinated approach.
Do you agree with the proposed selection criteria for emergency stopping sites?
Yes. However, the identification of traveling routes will be difficult - and so will enforcement.
Further comments
During the 1980's I was MP for Salisbury and had to come to terms with the mass invasions of Stonehenge (34,000 New Age Travelers) culminating in the watershed 'Battle of the Beanfield'. I went to the USA sponsored by the US Embassy to learn how the police manage rather than smash up such gatherings. I was later Minister for Roads and Traffic and we learnt how to manage security at new road developments. At the same time the various authorities quickly learnt to understand the very different needs of Gypsies, Romanies and Irish Travelers. Things are so much better than they were and this plan represents a good, innovative way forward as long as long-standing prejudices are addressed.

Rep ID: 10	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Yes, I agree	
Do you support the GTAA findings?	
Don't know	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
Yes
Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Yes, but “unacceptable impact” requires a better definition that is not subjective and allows racial/socioeconomic bias to be exerted.
Do you agree with the proposed selection criteria for emergency stopping sites?
Yes
Further comments

Rep ID: 11	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
No comments	
Do you agree with the proposed plan objectives? Please explain your answer.	
Yes	
Do you support the GTAA findings?	
I support the GTAA findings, but with regards to permanent pitch and permanent plot requirements I would propose some level of Wiltshire Council resource/budget is allocated to support Gypsy and Travellers bodies in development of planning proposals.	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
Agree
Do you agree with the proposed approach to meeting accommodation needs?
Agree
Do you agree with the proposed criteria?
Agree
Do you agree with the proposed selection criteria for emergency stopping sites?
Agree
Further comments
None

Rep ID: 12	
Consultee code: Parish	Consultee Organisation (if applicable): Chapmanslade Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
There needs to be a clear review point given the 15-year nature of the proposed plan. Trends are already reported as changing to less travel and more fixed sites and so there may be a requirement for an adjustment in numbers.	
Do you agree with the proposed plan objectives? Please explain your answer.	
They appear clear and achievable	
Do you support the GTAA findings?	
They are backed by direct consultation with the communities concerned.	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
<p>AGREE</p> <p>By providing emergency stopping sites it should reduce the ad hoc usage of other sites such as car parks and lay-bys.</p>
Do you agree with the proposed approach to meeting accommodation needs?
<p>YES</p> <p>This is a balanced approach which places equal weight on the needs of both the fixed and traveller communities.</p>
Do you agree with the proposed criteria?
<p>YES</p> <p>The criteria reflect the need to align with the existing planning process, and not create a 'special case' mentality. Sustainability of sites, and integration into the wider landscape and communities is also important and is sufficiently addressed.</p>
Do you agree with the proposed selection criteria for emergency stopping sites?
<p>The principles for establishing these are sound, but we have the following concerns: the permanent nature of these sites with roads, toilet facilities etc make them look like permanent sites and there is a danger that they will become so, rather than the short-tenure emergency sites envisaged. Given that the aim is to stop travellers from using sites with no amenities (car parks, fields etc) is there scope for creating less well-equipped sites that would only be attractive in emergency, or to limiting access to sites through a 'members' key system such as used by the British Waterways? Who will be responsible for the maintenance of these sites as proposed?</p>
Further comments
<p>Chapmanslade Parish Council discussed this consultation in a public meeting on 11 February 2021. In general, this is a balanced consultation. As a Parish Council we have particular concerns regarding the responsibilities around site maintenance, and in particular the proposed emergency stopping site proposed for the edge of our parish.</p>

Rep ID: 13	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	
agree	

Do you agree with the proposed approach to meeting accommodation needs?
Yes, however it is not clear who is going to pay for this? There are quite a number of privately owned G&T sites which could expand to cater for family needs, are they in ADDITION to the numbers of which we are aware or INCLUDED?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments

Rep ID: 14	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
The review needs to full assess all current sites sites and their pitch capacity. The list needs to be complete and include all sitesno matter how large or small.	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	
Emergency sites should be included in the total number of sites	

Do you agree with the proposed approach to meeting accommodation needs?
No no unauthorised sites should be tolerated.
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
The sites should be left spotless and clean after use and not have to be cleared at the Councils expense
Further comments

Rep ID: 15	
Consultee code: Neighbouring Authority	Consultee Organisation (if applicable): Dorset Council
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Dorset Council	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Dorset Council notes the intended scope of the development plan document will relate to both Gypsies, Travellers and 'Travelling Showpeople as defined in 'Planning policy for traveller sites' (2015). It is not clear at the outset of the document whether the plan will also relate to those people who associate themselves as ethnic Gypsies, Travellers and Travelling Showpeople or New Age Travellers, but who no longer meet the definition in planning policy.	
Do you agree with the proposed plan objectives? Please explain your answer.	
Dorset Council supports Wiltshire Council's aspiration to plan to meet its needs for pitches and plots to 2036. However, it is unclear whether the plan will also seek to meet the needs of those who associate themselves as ethnic Gypsies, Travellers and Travelling Showpeople, or New Age Travellers, but no longer meet the definition in planning policy. It is unclear whether Wiltshire Council has identified a need for transit sites in addition to emergency stopping sites. Further clarification around the terms may be helpful if emergency stopping sites are intended to serve the same function as a transit site.	

Do you support the GTAA findings?
Do you agree or disagree with the proposal to provide three emergency stopping sites?
It is not clear from the evidence presented in the consultation documents whether the distribution of planned emergency stopping sites reflects the distribution of unauthorised encampments (if there is any pattern to the distribution of these encampments) or whether the proposed encampments will have sufficient capacity to meet this need.
Do you agree with the proposed approach to meeting accommodation needs?
There appears to be some uncertainty around the land supply for pitches and plots. It is unclear whether Wiltshire Council intends to make specific allocations through this plan to meet the need. The lack of certainty over the number of pitches or plots that will be provided through intensification/enlargement of lawful sites or regularisation of unauthorised sites creates uncertainty over the number of new sites needed for permanent pitches to meet the identified need. Without further information it is unclear at this stage whether the approach is likely to deliver the pitches and plots needed within five years, and a reasonable prospect that the remaining pitches and plots will be delivered over the remaining period of the plan.
Do you agree with the proposed criteria?
Dorset Council notes the justification for the first proposed additional requirement that 'This new criterion does not preclude the use of greenfield sites but would require evidence that previously developed land has been considered.' It appears from the justification for the policy that this criterion will require applicants to demonstrate that they have considered brownfield sites before the council would give planning permission for a traveller site on greenfield land. This seems to be an overly onerous requirement especially given the potential for contamination and the need for remediation of some brownfield sites. This approach is akin to that required to justify changes to green belt boundaries and therefore sets a very high 'exceptional circumstances' test that may restrict the Council's ability to meet the identified need.
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments

Rep ID: 16	
Consultee code: Parish	Consultee Organisation (if applicable): Southwick PC
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
The Wiltshire Council Gypsy and Travellers Plan Consultation was discussed at a recent meeting of the Parish Council held on 16th February 2021. Although members had no specific response they wished to make to this consultation I have been directed to write and express the Parish Council's concern regarding the site at The Poplars in Southwick. This site continues to grow and gain momentum and the PC is concerned that this presents a risk for WC and for local landowners. Members have asked me to request a 'more dynamic' action from Wiltshire Council in the hope that this local issue can be addressed.

Rep ID: 17	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Savills
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Wessex Water Utilities LTD	
Does this representation refer to attachment(s): Yes - G&T_17	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
<p>Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above. As you are aware, Thames Water covers the North East of the Wiltshire and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:</p> <p>Water and Wastewater/Sewerage Infrastructure</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p> <p>Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</p> <p>Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....” The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable</p>

development” (Paragraph: 001, Reference ID: 34-001-20140306). It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater[and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us.

The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://www.thameswater.co.uk/preplanning>

In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage [and water supply] infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT “Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Comments in relation to Water Efficiency/Climate Change:

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Proposed policy text:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Flood Risk, Sustainable Drainage Systems and Water Management The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off-site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the neighbourhood Plan "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."

Comments on Site Allocations

The information contained within the new Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure. The majority of the proposed sites fall outside on the Thames Water area. For any sites that fall within Thames water's area, we recommend Developers contact Thames Water to discuss their development proposals by using our pre app service (link below) <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Water-and-wastewater-capacity> It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to

connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

Rep ID: 18	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Wessex Water
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Residential and other regularly occupied/sensitive development should not be permitted in locations likely to be adversely affected by the operation of sewage treatment, sewage pumping and other water treatment or supply infrastructure. This is to ensure development proposals are unaffected from odour emissions, noise, vibration, flies or other nuisance. An additional criteria should be added to ensure that sites are located outside of odour buffer zones of Sewage Treatment Works and Sewage Pumping Stations.
Do you agree with the proposed selection criteria for emergency stopping sites?
Residential and other regularly occupied/sensitive development should not be permitted in locations likely to be adversely affected by the operation of sewage treatment, sewage pumping and other water treatment or supply infrastructure. This is to ensure development proposals are unaffected from odour emissions, noise, vibration, flies or other nuisance. An additional criteria should be added to ensure that sites are located outside of odour buffer zones of Sewage Treatment Works and Sewage Pumping Stations.
Further comments
<p>Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above. As you are aware, Thames Water covers the North East of the Wiltshire and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:</p> <p>Water and Wastewater/Sewerage Infrastructure</p> <p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: “Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</p>

Paragraph 28 relates to non-strategic policies and states: “Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”

Paragraph 26 of the revised NPPF goes on to state: “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306). It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater [and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us.

The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

The developments demand for water supply infrastructure;

The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and

The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <https://www.thameswater.co.uk/preplanning>

In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage [and water supply] infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT "Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades."

"The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."

Comments in relation to Water Efficiency/Climate Change:

The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached

as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Proposed policy text:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Flood Risk, Sustainable Drainage Systems and Water Management The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan “It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”

Comments on Site Allocations

The information contained within the new Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure. The majority of the proposed sites fall outside on the Thames Water area. For any sites that fall within Thames water's area, we recommend Developers contact Thames Water to discuss their development proposals by using our pre app service (link below)

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/Water-and-wastewater-capacity/>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. We trust the above is satisfactory, but please do not hesitate to contact [NAME REDACTED] on the number above if you have any queries.

Rep ID: 19	
Consultee code: Non-stat Body	Consultee Organisation (if applicable): Cranbourne Chase AONB
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): Yes – G&T_19	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
<p>1. The constitution of this AONB's Partnership is set out in Annex A and the status and importance of AONBs in general, and in this AONB in particular, are set out in Annex B.</p> <p>2. This consultation response has been prepared under delegated authority.</p> <p>3. I see that the Consultation is the first step in developing a plan to identify accommodation needs for travellers to 2036. The objectives set out on page 7 appear to be well intentioned, reasonable, and appropriate.</p> <p>4. The AONB is not in a position to comment on the findings of your Gypsy and Traveller Accommodation Assessment. Nevertheless, it does recognise that there are needs for more or less permanent accommodation, albeit allowing for periods of travelling, and the separate category of 'emergency' stopping sites. I have often seen these referred to as 'transit' sites for occupation over short periods when travellers are predominantly in travelling mode.</p> <p>5. It seems to make sense to have a small number of these emergency sites distributed across the County and associated with major transit routes. Three such sites, north, west, and south, seem to be appropriate. International Dark Sky Reserve 2019</p> <p>6. The approach to provision by intensifying use on existing lawful sites and regularising unauthorised sites where appropriate also seems preferable to establishing completely new Brownfield or Greenfield sites.</p> <p>7. Clearly Gypsies, travellers or travelling show people do not need or require a site with an AONB location. I see that this is acknowledged in the criteria set out on pages 12 and 13 where criterion x) indicates that location or establishment of a site should not compromise a nationally recognised designation. The AONB is, of course, a national designation. Similarly, I see on page 14 relating to criteria for emergency stopping places, i) is that such places should avoid any adverse impact on local/national designations.</p> <p>8. This AONB Partnership concludes that your approach to the plan preparation seems appropriate and, subject to the criteria relating to avoiding impacts on national designations, this AONB is happy to support your approach to the plan preparation.</p>

Rep ID: 20	
Consultee code: Non-stat Body	Consultee Organisation (if applicable): The Canal & River Trust
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
The Canal & River Trust note that the Council have carried out a Boaters Needs survey but that the council intend to cover boaters requirements within the main plan. The Trust wish to work collaboratively with the Council on any proposed policies relating to facilities and sites for those using the canal and for canal related matters in general as soon as possible. further comments will be made in response to the main plan review.	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments

Rep ID: 21	
Consultee code: Parish	Consultee Organisation (if applicable): Westbury Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
More information about how the council will deal with unauthorised sites, and the unauthorised bricks and mortar on unauthorised sites as this causes much grievance between communities. Consider options for linked planning gain for those who provide land for use by the travelling community.	
Do you agree with the proposed plan objectives? Please explain your answer.	
Yes, it is proper that correct accommodation is provided and that it should respect both the needs of settled and traveller communities.	
Do you support the GTAA findings?	
It is reported that there are issues within the traveller's community which may mean that pitches will need to be spread over more sites, so that analysis of a number of pitches may be insufficient to meet the needs of a number of communities.	

We do not condone cultural objections between traveller communities but recognise that sites should be used in such a way that is sensitive to the reality of this situation.
Do you agree or disagree with the proposal to provide three emergency stopping sites?
We agree but where are they? Siting and advertising to the community will be important. As non-experts we would question if 3 is sufficient to fulfil the needs of the different travellers communities.
Do you agree with the proposed approach to meeting accommodation needs?
Yes, largely but the detail of which sites may be removed or enlarged may bring a different response in reality.
Do you agree with the proposed criteria?
Whilst 3km can provide a sensible criteria particularly for larger sites, this will deny travellers the opportunity to reside in rural areas where they may prefer to live and place an unfair burden on the smaller market towns.
Do you agree with the proposed selection criteria for emergency stopping sites?
The choice of sites should as far as possible avoid the possibility of spoiling the quiet enjoyment of existing residential properties as those passing through may have fewer concerns about impacts on their temporary neighbours. IE meet criteria 7 on the permanent sites.
Further comments
We do not see anywhere to add comments about boating and the boating community.

Rep ID: 22	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Highways England
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): Yes – G&T_22	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
<p>This consultation sets out the Council’s proposed approach to addressing the accommodation needs of the Gypsy and Traveller communities in Wiltshire to 2036.</p> <p>Highways England is satisfied with the broad scope of the consultation document and the three objectives, particularly objective 3 which seeks to ensure sites are appropriate and sustainable with regards to access.</p> <p>The consultation document outlines the approach to identifying sites, which appears to be reasonable, as well as the proposed assessment criteria for both permanent and emergency stopping sites. Highways England welcomes the inclusion of assessment criteria related to ensuring the sites do not result in a detrimental impact on the safe operation of the SRN and are served by safe vehicular access. However, it may be beneficial to both the local and strategic highway authorities for the criteria wording to better reflect the requirements of NPPF and outline that vehicular access should be safe and suitable for all users and that the proposed development does not result in an unacceptable impact on highway safety.</p> <p>We also welcome the inclusion within the assessment criteria of site servicing considerations, particularly with regards to drainage and water disposal, which should help to address unauthorised connections for any site in proximity to the SRN. Highways England requests that as potential sites are identified we continue to be engaged by the Council to help determine any potential impacts on the SRN and the site’s suitability against the identified assessment criteria.</p> <p>We trust that our response will be helpful and assist you with preparing your Local Plan. If you require further clarification on any issues, please do not hesitate to contact me.</p>

Rep ID: 23	
Consultee code: Agent	Consultee Organisation (if applicable): Ruston Planning Limited
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
I am pleased that the needs of the non PPTS ethnic Gypsies and Travellers are going to be provided for.	
Do you agree with the proposed plan objectives? Please explain your answer.	
See answer above	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?

Yes

Do you agree with the proposed criteria?

Change the following wording in order to give the policy some flexibility:

Where proposals satisfy the following general criteria to

Where proposals perform well against the following general criteria:

i. Priority must be given to effective use of previously developed land over greenfield land. This can include land last occupied by farmyards. (New criterion: In the interest of protecting undeveloped land. This new criterion does not preclude the use of greenfield sites but would require evidence that previously developed land has been considered.)

- Not in PPTS. The case law is quite clear on this point:

In seeking to determine the availability of alternative sites for residential gypsy use, there is no requirement in planning policy, or case law, for an applicant to prove that no other sites are available or that particular needs could not be met from another site.

Indeed such a level of proof would be practically impossible.

South Cambs v SSCLG + Brown [2008] EWCA Civ 1010

iv. The site can be properly serviced and is supplied with essential services, such as water, power, sewerage and drainage, and waste disposal. Where possible, sites should connect to mains. (Reason: To ensure that wherever possible, mains connections are achieved in the interest of sustainable development.)

The wording should be amended to include sustainable off grid solutions such as solar power.

vi. It is located in, or within three kilometres to, settlements that offer a range of local services and community facilities, in particular schools and essential health services. (Reason: Our evidence shows that sites which were granted permission, and those that were subject to appeal decisions, predominantly fall within three kilometres of a primary school and GP surgery. The proposed change would clarify what constitutes a reasonable distance.)

Change the 3 km to 'reasonable distance' in order to allow flexibility.

vii. It will not have an unacceptable impact on the character and appearance of the landscape and the amenity of neighbouring properties and is sensitively designed to mitigate any impact on its surroundings.

Change unacceptable to 'significant adverse impact'. makes the policy clearer.

Do you agree with the proposed selection criteria for emergency stopping sites?

Further comments

Rep ID: 24	
Consultee code: General Public	Consultee Organisation (if applicable): Steeple Ashton Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
No Comment	
Do you agree with the proposed plan objectives? Please explain your answer.	
<ol style="list-style-type: none"> 1. I agree that there needs to be more appropriate sites that are fully serviced to reduce unauthorised sites. 2. Temporary sites will need to be placed strategically and who will manage them? 3. Site locations need to be in liaison with Local Plan and neighbourhood plans as there is pressure on communities to build housing as well. 	
Do you support the GTAA findings?	

No comment
Do you agree or disagree with the proposal to provide three emergency stopping sites?
As long as this achieves its aim, which is to reduce temporary 'by the side of the road' pitches. Not sure it will achieve its aim as travellers by nature travel and stop in situ.
Do you agree with the proposed approach to meeting accommodation needs?
Appears to be a logical process. as long as it doesn't encourage more unauthorised sites to pop up that will then retrospectively seek authorisation; which would defeat the purpose.
Do you agree with the proposed criteria?
Restrictions need to take account of locality regarding conservation areas, areas of scientific interest and AONB. Sites should be considered in relation to local building needs; which should take priority, as sites for building would have more restrictions, and should be used as such as the priority.
Do you agree with the proposed selection criteria for emergency stopping sites?
Travel to and from these sites need to take account of access/egress on a 24-hour basis. disruption to local communities if near to housing.
Further comments
Whilst supportive of the policy, and the need, I do not see how the sites will be managed.

Rep ID: 25	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
No	
Do you agree with the proposed plan objectives? Please explain your answer.	
I agree. This should stop illegal expansion of sites	
Do you support the GTAA findings?	
Neither agree nor disagree	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
I agree in principle to the need for emergency sites but having no set number of pitches at the temporary site could lead to overcrowding? How would this be enforced?
Do you agree with the proposed approach to meeting accommodation needs?
Not convinced – I see the potential in this text for an existing site, that might have been previously refused planning, now to potentially accommodate new development.
Do you agree with the proposed criteria?
I agree. The sites should be in keeping with the local countryside, maintained and serviced, and hopefully enforcement would become less of a need if the site is defined and more permanent.
Do you agree with the proposed selection criteria for emergency stopping sites?
I agree
Further comments
If the county is going to all this trouble, I would like to see positive enforcement where and when it is required.

Rep ID: 26	
Consultee code: Neighbouring Authority	Consultee Organisation (if applicable): New Forest NPA
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
It would be helpful if the consultation document, and final document, clarified that it does not relate to the whole of the administrative area of Wiltshire Council, but excludes that area of the New Forest National Park in Wiltshire, which is covered by the National Park Local Plan. The map on page 5 of shows the whole of the Wiltshire Council area including that part of the National Park in Wiltshire. This has caused confusion in the past, with the National Park Authority defending decisions at public inquiry where applicants have quoted GTAA figures for Wiltshire Council for an application site within the Wiltshire area of the National Park (covered by a separate GTAA).	
Do you agree with the proposed plan objectives? Please explain your answer.	
The Authority supports the objectives set out in the consultation document, namely to meet the permanent and temporary accommodation needs, and especially objective 3 in stating that sites should be well-designed and in appropriate, sustainable locations. This clearly will help in respecting the setting of the National Park.	

Do you support the GTAA findings?

It is noted that consultants Opinion Research Services (ORS) have undertaken a comprehensive Gypsy & Traveller Accommodation Assessment (GTAA) that underpins the proposals in Wiltshire Council’s consultation document. This included an interview with an officer from the National Park Authority and direct engagement with the gypsy and traveller communities in Wiltshire. The assessment is consistent with the methodology used by ORS for the GTAA undertaken in 2017 for a consortium of seven local planning authorities in Hampshire, including the New Forest National Park Authority. The National Park Authority therefore considers the Wiltshire GTAA to be a robust and up to date assessment of the accommodation needs for Wiltshire Council’s planning area.

The Hampshire GTAA (May 2017) identified a need for 1 additional pitch within the New Forest National over the Plan period to 2036 for households that met the planning definition of gypsy and travellers. The National Park Authority met this identified need by allocating a site within the New Forest National Park Local Plan 2016 – 2036 (adopted August 2019). Full planning permission has subsequently been granted on this site allocation. The National Park Authority can therefore confirm that there is currently no unmet gypsy or traveller need arising from within the New Forest National Park that we would be looking to neighbouring authorities to meet. The Hampshire GTAA (May 2017) also identified a need for 21 additional plots for travelling showpeople households that meet the planning definition. These need arises from the existing travelling showpeople households within the New Forest National Park. As this identified need arising from an existing site with a long history and connection to the New Forest, the Authority would advise that we are not looking to neighbouring planning authorities to address the need, but will be looking to identify a site within the National Park through the development control process.

Do you agree or disagree with the proposal to provide three emergency stopping sites?

The Authority broadly supports the principle of planning for a number of emergency stopping places, and broadly supports the criteria. However, criteria i. could also make reference to the New Forest National Park (and its setting and special qualities), as well as AONBs. This is especially important if sites are being considered in the south Wiltshire area.

Do you agree with the proposed approach to meeting accommodation needs?

It is noted that Wiltshire Council intends to meet needs through a combination of regularising current unauthorised sites, and allocating new sites or identifying broad locations for growth. It is unclear from the consultation document how many new site allocations may potentially be required in the Local Plan period up to 2036, or how wide any broad growth area may be. However, the Authority notes that the criteria for the site assessment of permanent sites are relatively unchanged from those in the existing Core Strategy and broadly supports the amended criteria.

Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments

Rep ID: 27	
Consultee code: General Public	Consultee Organisation (if applicable): Private individual
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): Yes – G&T_27	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
<p>The existing sites are focussed in a small number of areas. There should be a conscious effort to spread sites over more of the major Wiltshire towns. The Council is preparing a specific single-issue Development Plan Document to address the accommodation needs of Wiltshire’s travelling communities and to update Core Policy 47 of the Wiltshire Core Strategy which deals with the accommodation needs of gypsies and travellers.</p> <p>The Council agreed in October 2020 to undertake public consultation on the scope of the specific DPD for travelling communities. To that end, it has published an initial consultation document as the first stage of preparing it.</p> <p>The Council’s October 2020 Cabinet report (paragraph no.5) highlights that preparing a specific DPD for travelling communities will enable the Council to identify the accommodation needs of travellers to 2036 and to make provision through site allocations and an up-to-date planning policy.</p> <p>Importantly, the report notes (in paragraph no. 14) that a ‘call for sites’ will be undertaken to identify opportunities for sites for travellers. This is welcome as sites may come forward that are more suitable than the existing sites (either as they are or with more intensified development).</p> <p>The scope of the DPD as set out in the current consultation document is supported as it is helpful that this topic is addressed through a robust and up to date planning policy framework given:</p>	

*the challenges of identifying accommodation needs and suitable locations; and
*providing a rigorous set of criteria for the determination of planning applications for sites for the traveller community.
The planning system in this country is based on a plan-led approach and a specific DPD that has been through the necessary statutory scrutiny will accord with that.

Do you agree with the proposed plan objectives? Please explain your answer.

See response in Question 8. Objective 1 in the consultation document deals with the issue of meeting identified accommodation needs. The DPD must be based on an up to date and robust accommodation needs assessment. The GTAA survey dates from late 2019 and it will be important to ensure that the survey remains valid and appropriate throughout the programme for preparing the DPD. The GTAA should be refreshed ahead of the Local Plan Examination for the DPD so that the Inspector can be certain that the evidence base is robust and up to date.

Objective 3 deals with site location and refers to 'provide well designed sites in keeping with their surroundings, and in appropriate and sustainable locations with good access to facilities and services; which respect both the interests of the settled and traveller communities. The commitment to maintaining the interests of the settled community is strongly supported and this will be most readily achieved if any site allocations focus on locating sites well away from established bricks and mortar accommodation occupied by the settled (non-travelling) community rather than proposing / allocating sites adjoining existing homes.

There should be a clear commitment to the DPD including robust criteria for the determination of any planning applications for sites for the travelling communities so as to ensure that the amenity of the existing settled community is safeguarded and that the communities within such sites are able to have an appropriate residential environment.

Do you support the GTAA findings?

See response in Question 8. No specific comments are made in this response on the findings in the GTAA report given the highly specialised nature of this work. The formal scrutiny of the DPD by a Local Plan Inspector and other stakeholders will examine the findings in detail.

The GTAA proposes that three sites are provided for emergency stopping and suggests broad locations for these (north, west and south Wiltshire). The DPD should consider very carefully how many pitches are required having regard to the significant fluctuations in the numbers of unauthorised encampments across 2016-2019 to ensure that other land use requirements can be satisfactorily addressed and to avoid other land and activities being blighted.

The proposed approach to meeting identified accommodation needs includes a focus on intensifying the accommodation on existing sites. It is essential that the DPD clearly set out the Council's commitment to safeguarding the amenity of the settled community in this approach. As set out in the consultation document, it would appear that the focus of the DPD will be very much on addressing the needs arising from the GTAA when a more balanced approach is needed that takes account of interests across the whole community.

The DPD supporting documents should clearly evidence how each individual allocated site will be configured to accommodate the needs of the traveller communities within those sites and how adjoining occupiers and uses will be protected. Information should be provided for each site to show the accommodation being provided and how it will be arranged within the site. Comprehensive information should be prepared to illustrate how boundaries will be treated and how sites will be provided with necessary services. This information should be prepared for individual sites on a comprehensive basis and published at each of the further stages in the preparation of the Local Plan (Regulation 19 and formal submission to the Planning Inspectorate). Confirmation should be secured from the traveller community on each site that the layout and accommodation proposed on each proposed site allocation meets their requirements and is deliverable. It should include a degree of flexibility to encompass any changes over the period of the plan.

Figure 3 is informative in so far as it identifies the key decision points in the process but it should be revised to include the points above.

Do you agree or disagree with the proposal to provide three emergency stopping sites?

See response in Question 8. Duration of stay in emergency sites should be stated and monitored.

Do you agree with the proposed approach to meeting accommodation needs?

See response in Question 8. The density and size of the plots will be different for sites in rural and urban areas. The proposed site assessment criteria for permanent sites should be consistent with the requirements set out in national planning policy - specifically, 'Planning Policy for Traveller Sites (2015)'.

Do you agree with the proposed criteria?

See response in Question 8.

iv) The Traveller sites should comply with national standards for residential caravan sites for electrical compliance, gas storage and demonstrate compliance. The fire risks associated with all caravans whether static or touring (occupied or not) should be considered and mitigated.

vii) The population and thus noise along with site lighting all contribute to the impact on neighbouring properties - especially in rural areas.

viii) Adequate levels of privacy apply to neighbours as well as occupiers.

Do you agree with the proposed selection criteria for emergency stopping sites?

See response in Section 8

Further comments

Particular comments have been made against Questions 1 to 7. Further comments on Consultation Document are included in Question 8.

Response to consultation on Gypsies and Travellers Development Plan Document - Regulation 18 stage [needs to be submitted by March 9 2021]. The respondent [NAME REDACTED] wishes to be added to the consultation database for both the Local Plan review and the Gypsies and Traveller DPD. The respondent wishes to be advised of all future consultation(s) on the preparation of the Gypsies and Traveller DPD.

It is a serious oversight that the consultation arrangements for the Gypsies and Travellers DPD (as set out in the October 2020 Cabinet report in paragraph no. 15) make no reference or commitment to notifying residents in the settled community who adjoin existing gypsy and traveller sites about the preparation of the specific Gypsies and Travellers DPD nor their opportunity to engage in this initiative. This is a significant given the planning sensitivities that are often in place where such sites are in close proximity to the settled community. An area mailshot is not sufficient for those immediately adjoining the sites.

Furthermore, paragraph no. 16 of the Cabinet report draws attention to the difficulties caused by undertaking consultation on the emerging DPD during the Covid pandemic - specifically, that consultation material will not be viewable at Council offices and libraries in the interests of public safety.

The Council should carefully consider if the public consultation on the early stages of the preparation of this important DPD has been satisfactory in the light of these two issues. It would be unfortunate if these shortcomings were exposed at the Examination into the DPD such that further work has to be done which would delay its adoption.

My full response to the Consultation Document and referred to as Question 8 will not fit in Section 14 thus I will e-mail them to the address shown on the form - spatialplanningpolicy@wiltshire.gov.uk

Rep ID: 28	
Consultee code: Agent	Consultee Organisation (if applicable): Murdoch Planning Limited
Is this response on behalf of someone else/another organisation? Yes	
Organisation being represented (if applicable): Murdoch Planning Limited	
Does this representation refer to attachment(s): Yes – G&T_28a to G&T_28e	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Both allocations and realistic criteria - not CP47	
Do you agree with the proposed plan objectives? Please explain your answer.	
Broadly but sites should be within a reasonable distance of services and facilities rather than good access Objective 3	
Do you support the GTAA findings?	
Yes as they include both PPTS and ethnic Gypsies and Travellers	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Broadly
Do you agree with the proposed approach to meeting accommodation needs?
This all depends on how realistic the criteria are - CP47 acted to frustrate site provision hence the substantial increase in needs since the Core Strategy was adopted.
Do you agree with the proposed criteria?
No - criterion 1 is too onerous; vi should be deleted; x is too tightly drawn. This needs radical rethink.
Do you agree with the proposed selection criteria for emergency stopping sites?
No too tightly drawn - i) delete 'any' replace with 'unacceptable'; site can be located in flood zones where FRA establishes safety;iii delete near or adjacent to, replace with within a reasonable distance.
Further comments
I would like to take part in the Hearings in due course. This submission is made on behalf of [NAMES REDACTED] sites to promote that would help meet the identified need.

Rep ID: 29	
Consultee code: Parish	Consultee Organisation (if applicable): Everleigh Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
The scope of the plan is comprehensive.	
Do you agree with the proposed plan objectives? Please explain your answer.	
Agreed. The plan objectives are clear and concise.	
Do you support the GTAA findings?	
The GTAA findings appear to provide a sound basis for future planning.	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Agreed. This contingency planning appears to be a good initiative.
Do you agree with the proposed approach to meeting accommodation needs?
Yes. The priority should be to develop existing lawful sites.
Do you agree with the proposed criteria?
Yes. These criteria for permanent sites should provide effective guidelines for future development.
Do you agree with the proposed selection criteria for emergency stopping sites?
These criteria should fulfil the requirements for emergency stopping sites.
Further comments
Accommodating Gypsies and Travellers in Wiltshire should remain clearly focused on utilising and developing existing permanent sites, with a small number of temporary emergency stopping sites as a reserve.

Rep ID: 30	
Consultee code: Parish	Consultee Organisation (if applicable): Marlborough Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Yes. It is important to provide safe spaces and access to education and other services. All children need an education but, what would happen where schools don't have available places? For example, in Marlborough, families are already having to look further afield for a school place for their children.	
Do you support the GTAA findings?	

Do you agree or disagree with the proposal to provide three emergency stopping sites?

Yes - if these three sites are in the correct location (i.e. along their usual routes) and will be used by the traveller communities as they move across the county, and result in less unauthorised encampments.

Do you agree with the proposed approach to meeting accommodation needs?

Yes. Good access to each emergency site is a must to avoid holding up traffic on the main roads as the traveller community turn into the site.

Do you agree with the proposed criteria?

Do you agree with the proposed selection criteria for emergency stopping sites?

Agree, although there is no specific mention of the site being accessible for rubbish and waste disposal.
Who would be liable for the clean-up bill when the travellers leave? Would they be charged there and then as they obviously move around? Who would be collecting this money? Also, who would be in charge of regular checks on the sites?
What happens if it doesn't work out? Who pays the cost of legal action and clean up.
Good access to each emergency site is a must to avoid holding up traffic on the main roads as the traveller community turn into the site.

Further comments

Given that recognised sites are being designated, what powers are envisaged for control of travellers setting up informal or illegal sites on public or private land?
The Council should identify the revenue stream which will be used for recognised site maintenance & that for illegal site enforcement.
There's a real desire that the proposals work – everyone needs a home. But there are concerns that wherever Wiltshire Council puts the sites, it will take a back seat. If, for example, a site is in Marlborough then local residents may have to deal with any

impact. As soon as it is known where these sites are, everyone must work together from day one and that includes Wiltshire Council, the travellers, police, town and parish council.

Rep ID: 31	
Consultee code: Parish	Consultee Organisation (if applicable): Dilton Marsh Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
The plan should identify which of the 3 types of site – privately owned, local authority, unauthorised - are marked on the map in Fig 1 as well as their location, number of households in occupation and maximum permitted number of households. Eg, what is no 38?	
Do you agree with the proposed plan objectives? Please explain your answer.	
On the whole, yes, but why do the temporary sites need to be classed as “emergency stopping sites”? Also, what does “temporary” mean in terms of time limit?	
Do you support the GTAA findings?	
We have no option but to support the GTAA findings as we have no other information available to us with which to compare.	

We don't understand how gypsy and traveller households can fail to meet the planning definition for gypsies, travellers and travelling showpeople and yet still require 78 pitches between 2019 and 2036?

Do you agree or disagree with the proposal to provide three emergency stopping sites?

We agree with the proposal to provide 3 sites but believe there should be a limit to the number of pitches, eg, if there were 161 unauthorised encampments from January to September 2019, how many people/pitches did that involve?
Again, there is a need to clarify the definition of "temporary". How long is "temporary" for? And why are they classed as "emergency stopping sites"?

Do you agree with the proposed approach to meeting accommodation needs?

We agree.

Do you agree with the proposed criteria?

We don't have any objections.

Do you agree with the proposed selection criteria for emergency stopping sites?

Not entirely, no. There is no size/number of pitches specified for the sites and feel this is crucial.
Criterion vi: it will be impossible not to have any visual impact on surrounding land unless extensive, expensive landscaping is incorporated.
Criterion ix: it is not clear what this means.

Further comments

Who will monitor the temporary sites? How will travellers access these sites? Who will clear up after the travellers have moved on? What will be their "temporary" length of stay? What makes them "emergency stopping places"?

Rep ID: 32	
Consultee code: Parish	Consultee Organisation (if applicable): Mere Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
We would like to raise our concerns over the possibility of allocating Gypsy and Traveller sites in close proximity of one another due to county borders. We have one Gypsy and Traveller site in existence in Mere but we believe that there is a Gypsy & Traveller site allocation in Milton on Stour which is only approximately 2 miles away on the same road.

Rep ID: 33	
Consultee code: Parish	Consultee Organisation (if applicable): Redlynch Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
<p>Redlynch Parish Council strongly recommends that the Plan should base any accommodation and pitch requirement calculations on the forthcoming census, as it would make sense to use the latest data in any site planning.</p> <p>It was felt the plan should include some cost estimates for establishing the various sites, and identify where the funding would come from along with projected ongoing costs and funding.</p> <p>It was also felt the inclusion of trend data on how the population and behaviour patterns of Gypsies, Travellers and Travelling Show People have changed over the last ten years.</p>	
Do you agree with the proposed plan objectives? Please explain your answer.	
<p>Objective 1 – Meeting needs for permanent accommodation The framework for assessing proposals would need to be robust to ensure existing infrastructure can support increased pitches and plots.</p> <p>Objective 2 – Making Provision for temporary accommodation.</p> <p>The GTAA document states that “given the size of the county driving distances to transit sites can be long and therefore deter Travellers from making the journey. Multiple smaller stopping places could provide an agreeable alternative” – from north to south</p>	

of the county is just over 50 miles so the need for three stopping sites seems excessive. A transit site located centrally within the County would overcome the driving distances or alternatively provide extra pitches at approved existing sites which would negate the need for a new site.

The GTAA also states “consider provision of locations around Trowbridge, Salisbury and to the north of the county” – both Salisbury and the north of the county have the majority of Gypsy and Traveller sites in the county and therefore further sites increases pressures on these areas. A central location would make more sense as stated in the GTAA to avoid driving distances – why place sites in the most southern and most northern parts of the county!

3 – Site Locations

There needs to be an even distribution of sites throughout the county to ensure facilities and services are not over stretched in areas where most sites already exist. The majority of existing sites are in the north, west and around Salisbury. These areas should not be allocated further sites just because there are sites already in these locations. With no sites in the east of the county this area should be considered first to ensure an even distribution of sites.

Further sites around Salisbury could increase pressures on the New Forest National Park in terms of increased recreational use and cross-Park traffic.

Do you support the GTAA findings?

It is very hard to predict the future need for pitches and plots and even with the steps taken in the GTAA to establish the numbers it is an estimation.

Do you agree or disagree with the proposal to provide three emergency stopping sites?

No, we disagree. As stated above the need for three sites seems excessive when you consider the distance between the north and south of the county. A centrally located site would address the concerns raised in the GTAA about travelling distances.

Do you agree with the proposed approach to meeting accommodation needs?

We agree with the review of lawful sites to establish if additional pitches or plots could be accommodated but the number of additional pitches or plots should be limited to ensure facilities and services within the area are able to cope. As stated earlier other parts of the county which do not have sites should be considered to ensure an even distribution of sites throughout the county. Sites should be sustainable with access to education and health care facilities for travellers, it should therefore be critical to assess the availability and capacity of such a provision as a part of the site location assessment. This would be for both the

benefit of travellers and the community within which they will share those facilities. This capacity should be considered over the same long time period considering the changing demographic and needs of the existing local population etc. Unauthorised/tolerated sites should be regularised and the necessary planning permissions established before accommodating any additional pitches or plots.

Do you agree with the proposed criteria?

Yes, we agree with the proposed criteria but would also reinforce the need to ensure current infrastructure of the area is able to accommodate the number of pitches or plots. We also request the criteria takes into account the number of sites already in an area as south of Salisbury already have a large number of sites and due to its close proximity to the New Forest National Park further pitches or plots would increase pressures on the Park. Other areas of the county with no or very few pitches or plots should be given first consideration to ensure an even distribution sites.

Do you agree with the proposed selection criteria for emergency stopping sites?

We disagree with point iii the site should be near or adjacent to key travelling routes identified in the GTAA as these areas already have the highest concentration of sites and increases extra pressure on resources in these areas. We also do not feel that “space for a clear barrier around the site is required to prevent unauthorised extension to the site” will be sufficient enough action to ensure sites are not extended illegally. We also have concerns that these sites would actually be used and what action would be taken to move travellers to the emergency stopping sites. How will Wiltshire Council ensure these sites remain only temporary sites for emergency stops and don’t become permanent? What if users of these sites refuse to move on after the agreed stopping time?

Further comments

In summary the Council do not agree with the need for three transit sites and would not want to see any further sites in the areas which already have existing sites. New sites should be allocated to the east of the county or other areas with no or very few existing sites to ensure they can be supported by the current infrastructure and with an even distribution of sites throughout the county this could assist with transit areas.

Rep ID: 34	
Consultee code: Agent	Consultee Organisation (if applicable): Murdoch Planning Limited
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
DUPLICATE OF REPRESENTATION 28	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments

Rep ID: 35	
Consultee code: Parish	Consultee Organisation (if applicable): Cricklade Town Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Sites should be identified as having regard to highway considerations and potential for noise and disturbance from movement of vehicles	
Do you agree with the proposed plan objectives? Please explain your answer.	
Yes	
Do you support the GTAA findings?	
On the increase of household rates yes. Single parent households yes	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
Do you agree with the proposed approach to meeting accommodation needs?
No comment
Do you agree with the proposed criteria?
No comment.
Do you agree with the proposed selection criteria for emergency stopping sites?
<p>Agree but these: Emergency sites should provide safe and convenient access to road networks and be located so as to cause minimum disruption to surrounding communities. When considering the suitability of different sites, the potential presence of young children and any risks that may arise due to adjoining land uses must be considered. Emergency sites can guide Gypsy and Traveller families away from unauthorised encampments. Instead, if appropriate, families can stay on the purpose-built site which provides access to basic amenities in a secure environment. We would like to see evidence produced for their efficacy elsewhere in the country. The costs of providing them would be substantial and this would not be well spent if they are not used in the way intended.</p>
Further comments
<p>Cricklade currently is well served with traveller sites having 62 pitches within 4 miles of the town centre. This is approximately 20% of all the 318 authorised pitches in Wiltshire. Where unauthorised development has occurred the LPA should take vigorous enforcement action, including the service of stop notice to remedy the breach urgently. Authorised sites should have minimum impact on adjoining land uses and the natural and built environment. Authorised sites should be well located to meet the needs of occupants and permitted business activities and provide acceptable access to services.</p>

Rep ID: 36	
Consultee code: Parish	Consultee Organisation (if applicable): Bremhill Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
The number of gypsy and traveller households requiring accommodation and the criteria to be used for allocating sites.	
Do you agree with the proposed plan objectives? Please explain your answer.	
Yes. Clear and transparent objectives are required.	
Do you support the GTAA findings?	
Yes. It has recognised the unidentified need which cannot be factored into the plan. Clear criteria have been set for allocating land to this unidentified need.	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
Yes. This will avoid gypsies and travellers having to identify sites themselves which do not meet the site criteria. Such unplanned use of land is detrimental to the local area and bad for community relations. It is essential these sites have facilities for waste disposal (both human and household) and running water.
Do you agree with the proposed approach to meeting accommodation needs?
Yes. Increasing capacity of existing sites is the first priority (equivalent to using brownfield sites for all development). Clearly if unauthorised sites are being tolerated they should be considered next as long as they meet the criteria. New sites and certainly any on greenfield sites should be a last resort.
Do you agree with the proposed criteria?
Yes. Need clear and transparent criteria that apply to all sites. Particularly important when looking at sites for the present unidentified need.
Do you agree with the proposed selection criteria for emergency stopping sites?
Yes. Again need clear and transparent criteria.
Further comments
None.

Rep ID: 37	
Consultee code: General Public	Consultee Organisation (if applicable):
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): yes	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
The plan should reflect the needs of the Gypsy and Traveller Community who currently reside within the Council area recognising that based on the figures provided i.e. 757 individuals in 2011 that such community has no greater rights, or lesser obligations than those of those deemed the “settled community”	
Do you agree with the proposed plan objectives? Please explain your answer.	
Whilst it is wholly appropriate that the needs of the Gypsy and Traveller Community who currently reside within the Council should be addressed by the objective of the plan, such plan should not include those of individuals travelling through the county beyond those matters that would be included with a county wide plan for individuals not of the Gypsy and Traveller Community travelling through the County.	

Do you support the GTAA findings?
No comment
Do you agree or disagree with the proposal to provide three emergency stopping sites?
We would be supportive of the inclusion of provision of emergency stopping sites, to the extent that similar investigations to establish the needs of the “settled community” who travel through the county were firstly undertaken, and then a comprehensive solution for both communities were developed.
Do you agree with the proposed approach to meeting accommodation needs?
As referred to above, the satisfaction of the accommodation needs of the Travelling and Gypsy community should be provide appropriate support where integrated with those of the wider settled community and agreed by the community. The main principles proposed of firstly evaluating existing sites is however wholly sensible and supportable.
Do you agree with the proposed criteria?
The criteria as proposed, with the addition of “adequate levels of privacy should be provided to other properties and communities” around any site.
Do you agree with the proposed selection criteria for emergency stopping sites?
No, the overall plan needs to be integrated with plans to be consulted upon by the settled community and settled Gypsy and Traveller Community.
Further comments
None We look forward to further consultation on this matter.

Rep ID: 38	
Consultee code: Statutory Body	Consultee Organisation (if applicable): Environment Agency
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
Thank you for consulting the Environment Agency on the above scoping document. We have no major concerns with the proposed document scope at this stage. However, when screening sites for suitability please consider the protection of groundwater drinking water supplies (i.e. boreholes). We advise that sites are not located within Source Protection Zone 1. Ideally they should not be located within SPZ2/3 either, unless strict measures can be put in place to protect groundwater. Please include reference to this issue in your policy document.

Rep ID: 39	
Consultee code: Neighbouring Authority	Consultee Organisation (if applicable): West Berkshire Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
no comments.	
Do you agree with the proposed plan objectives? Please explain your answer.	
No reason to disagree	
Do you support the GTAA findings?	
No reason to disagree	

Do you agree or disagree with the proposal to provide three emergency stopping sites?
No reason to disagree with the approach. It would be helpful in future stages of the DPD to outline where these might be located, or provide an indication of broad locations. As part of the West Berkshire GTAA 2019 (not currently published) there was some discussion as part of local authority consultation that the provision of transit pitches, or in this case, emergency stopping places, could be part of a strategic cross-boundary response to unauthorised encampment activity. This depends on whether there is cross border movement between Wiltshire and West Berkshire. The West Berkshire GTAA (2019) does not suggest that there is such movement, but going forward, the location of emergency stopping sites may impact on this. Similarly, the West Berkshire GTAA (2019) recommends that the Council investigate transit sites and a tolerated stopping policy. This has not yet been explored as part of the West Berkshire Local Plan Review, currently at the Regulation 18 stage.
Do you agree with the proposed approach to meeting accommodation needs?
No reason to disagree. West Berkshire Council would like to be kept up to date as to where sites are to be allocated and where the broad locations for growth would be. For reference, as set out in Policy DC19 of the West Berkshire Local Plan Review (Regulation 18), there is a 5 year cultural need for 20 permanent pitches, and PPTS need for 18 permanent pitches. Overall, in the Local Plan period (in the GTAA case, up to 2036) a cultural need of 51 permanent pitches and a PPTS need of 48 pitches has been identified. There is an overall need for 24 Travelling Showpeople plots, which may be accommodated on an existing site. West Berkshire Council are looking to meet the identified need through the allocation of pitches, and include a criteria based policy for Gypsy and Traveller pitches/sites in the same manner as Wiltshire has done. More work will be undertaken in the lead up to the Regulation 19 consultation, and should the Council identify any cross border issues with meeting need particularly in the western side of the District the Council will make contact with Wiltshire Council, and other neighbouring authorities.
Do you agree with the proposed criteria?
No comment.
Do you agree with the proposed selection criteria for emergency stopping sites?
No comments.

Further comments

West Berkshire Council would like to be kept up to date on the proposed areas for allocated sites and locations for emergency stopping places, particularly if they are near to the boundary with West Berkshire. Similarly, West Berkshire Council will liaise with Wiltshire Council as work on the Local Plan Review and sites for Gypsy and Travellers progresses, should it be necessary. Additionally, although not set out in the DPD, there may need to be some discussion about the needs of houseboat accommodation. The Kennet and Avon Canal runs through Wiltshire and West Berkshire. The West Berkshire GTAA (2019) does not identify need for houseboat dwellers.

Rep ID: 40	
Consultee code: Parish	Consultee Organisation (if applicable): Whiteparish Parish Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
The plan contents seem sensible, one aspect not given sufficient weight in the Scope is any mention of the majority of residents and the Plans effect on the wider community.	
Do you agree with the proposed plan objectives? Please explain your answer.	
In the main yes. It is important that sufficient weight is given to Objective 3. Provision of sites alone is not going to impact levels of breastfeeding, smoking or long term health conditions. See Fig 2. Is Wiltshire Council intending to allocate additional finance to undertake specific campaigns to address these other (cultural?) issues alongside increased provision of sites either temporary or permanent?	

Do you support the GTAA findings?
<p>Broadly, although we struggle with understanding table 3. Are we to assume that these un-determined households are or are not in the proposed pitch numbers?</p> <p>We also have an issue with the consultation process deployed during the GTAA. Is WC comfortable with undertaking exactly the same consultation process to identify needs for council/low cost social housing - and then undertaking further consultation as to how to provide the same?</p> <p>The GTAA findings run very close to positive bias in favour of Gypsies and Travellers. This is both unfair and potentially illegal.</p>
Do you agree or disagree with the proposal to provide three emergency stopping sites?
<p>Yes - providing that these are regulated: it would be better to provide specific pitches in already identified sites, assuming that existing sites are sustainable. Who will ensure emergency site are used in preference to unauthorised encampments?</p>
Do you agree with the proposed approach to meeting accommodation needs?
<p>Yes - This looks like a good strategy to limit a proliferation of unplanned sites.</p> <p>The proposal to intensify use of existing sites and to regularise unauthorised sites could be problematic, because some may well not meet the selection criteria for new sites. Will a reduced version of the criteria for new sites be applied? If so how will it be determined?</p>
Do you agree with the proposed criteria?
<p>Yes it seems to be a good list of criteria, however it will only work if it is actually applied with rigour and is not subjected to political pressure from special interest groups</p> <p>However the target number of sites needs to be fixed. What stops travellers from other parts of the country arriving and occupying WC provided sites?? How will the sites be preserved for the intended members of the community?</p>
Do you agree with the proposed selection criteria for emergency stopping sites?
<p>We suggest adding a criterion that the emergency sites should be near to existing GTA sites or additional pitches on existing sites identified specifically for emergency stopping sites.</p> <p>This would be more convenient to monitor and manage.</p> <p>Who monitors "emergency" or "temporary"?</p>

If you have any further comments you wish to make, please detail them below.
Further comments

Rep ID: 41	
Consultee code: Neighbouring Authority	Consultee Organisation (if applicable): South Gloucestershire Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
<p>Thank you for contacting South Gloucestershire Council in relation to Wiltshire Council’s Planning for Wiltshire’s Gypsy and Traveller Communities consultation document published in January 2021. Apologies for the delay in responding to you.</p> <p>Officers note that there are a number of similarities between Traveller communities in Wiltshire and those in South Gloucestershire, including their diverse make up. The reasons for Wiltshire seeking to meet the Travelling Communities’ needs are understood and supported, and the three objectives proposed appear appropriate for the Plan.</p> <p>Officers note and understand the findings of Wiltshire’s Gypsy and Traveller Accommodation Assessment (GTAA), which was undertaken by Opinion Research Services (ORS), and the approach proposed to meeting the needs identified. For information, South Gloucestershire Council is currently working with ORS to prepare a refresh of its own GTAA, alongside the similar work being undertaken by the other West of England authorities.</p> <p>Officers also understand and support the proposed sequential approach to meeting accommodation needs: first through looking at opportunities for intensification of use on existing, authorised sites; then by looking at opportunities to ‘regularise’ any authorised sites, and; then by seeking to meet any residual needs through the allocation of new sites through the Plan. The use of Figure 3 to clearly explain this approach is also considered helpful. The approach outlined is likely to be similar to that proposed for meeting the accommodation needs of South Gloucestershire’s Travelling communities through our Local Plan.</p> <p>Officers have no specific comments to make in relation to the proposed site assessment criteria presented for permanent or temporary sites.</p> <p>In summary, officers consider that the consultation document is clear, concise and presents an appropriate approach to identifying sites and broad locations for growth to meet permanent and temporary accommodation needs.</p> <p>Duty to cooperate</p>

The Duty to Co-operate (DTC) places a legal duty on local planning authorities and other prescribed bodies engage constructively, actively and on an ongoing basis to develop development plan documents, in respect of strategic matters. Officers note the findings of the GTAA section 5 (stakeholder engagement) and sections 5.35 and 5.36 which relate specially to South Gloucestershire.

Officers have no comments to make in respect of the DTC at this stage, but look forward to further opportunities to constructively and actively engage with Wiltshire colleagues as plan preparation progresses.

We hope this response is helpful. Please feel free to get in contact if we can be of any further assistance at this stage.

Rep ID: 42	
Consultee code: Parish	Consultee Organisation (if applicable): Whiteparish Parish Clerk
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
DUPLICATE OF REPRESENTATION 40	
The plan contents seem sensible, one aspect not given sufficient weight in the Scope is any mention of the majority of residents and the Plans effect on the wider community.	
Do you agree with the proposed plan objectives? Please explain your answer.	
In the main yes. It is important that sufficient weight is given to Objective 3. Provision of sites alone is not going to impact levels of breastfeeding, smoking or long term health conditions. See Fig 2. Is Wiltshire Council intending to allocate additional finance to undertake specific campaigns to address these other (cultural?) issues alongside increased provision of sites either temporary or permanent?	

Do you support the GTAA findings?
<p>Broadly, although we struggle with understanding table 3. Are we to assume that these un-determined households are or are not in the proposed pitch numbers?</p> <p>We also have an issue with the consultation process deployed during the GTAA. Is WC comfortable with undertaking exactly the same consultation process to identify needs for council/low cost social housing - and then undertaking further consultation as to how to provide the same?</p> <p>The GTAA findings run very close to positive bias in favour of Gypsies and Travellers. This is both unfair and potentially illegal.</p>
Do you agree or disagree with the proposal to provide three emergency stopping sites?
<p>Yes - providing that these are regulated: it would be better to provide specific pitches in already identified sites, assuming that existing sites are sustainable. Who will ensure emergency site are used in preference to unauthorised encampments?</p>
Do you agree with the proposed approach to meeting accommodation needs?
<p>Yes - This looks like a good strategy to limit a proliferation of unplanned sites.</p> <p>The proposal to intensify use of existing sites and to regularise unauthorised sites could be problematic, because some may well not meet the selection criteria for new sites. Will a reduced version of the criteria for new sites be applied? If so how will it be determined?</p>
Do you agree with the proposed criteria?
<p>Yes it seems to be a good list of criteria, however it will only work if it is actually applied with rigour and is not subjected to political pressure from special interest groups</p> <p>However the target number of sites needs to be fixed. What stops travellers from other parts of the country arriving and occupying WC provided sites?? How will the sites be preserved for the intended members of the community?</p>
Do you agree with the proposed selection criteria for emergency stopping sites?
<p>We suggest adding a criterion that the emergency sites should be near to existing GTA sites or additional pitches on existing sites identified specifically for emergency stopping sites.</p> <p>This would be more convenient to monitor and manage.</p> <p>Who monitors "emergency" or "temporary"?</p> <p>If you have any further comments you wish to make, please detail them below.</p>

Further comments

Rep ID: 43	
Consultee code: General Public	Consultee Organisation (if applicable): Marlborough Resident
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
Do you agree with the proposed plan objectives? Please explain your answer.	
Do you support the GTAA findings?	
Do you agree or disagree with the proposal to provide three emergency stopping sites?	

Do you agree with the proposed approach to meeting accommodation needs?
Do you agree with the proposed criteria?
Do you agree with the proposed selection criteria for emergency stopping sites?
Further comments
I do not object to the provision of facilities for this community but am very mindful of the problems caused to residents when they descend, without warning, on any town/village. I believe access to any facility should be pre-arranged and secured by a significant deposit to cover the possible cost of clearing up after them and damage etc.

Rep ID: 44	
Consultee code: Agent	Consultee Organisation (if applicable): Heine Planning consultancy
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
<p>DPD will address the need of non travelling household protected under the equality legislation. I agree with this approach but I think you should make clear on p3 that this document concerns all Travellers under the Equality legislation / Housing Act not just the planning definition. The PPTS definition is being challenged in the courts as it makes an unnatural, unworkable and ridiculous distinction between those who travel and those who do not. Councils are under a duty to meet the needs of all those with an ethnic preference to live in a caravan. In my experience most authorities now agree with the approach on P8 to provide for all Ethnic Travellers and that the distinction in PPTS is a nonsense. You can not expect families to live apart just because some stilltravel for an economic purpose and others are unable to do so because of caring responsibility, age, health etc. We do not plan housing on this basis. We do not segregate the settled population this way. So please be clear who you are planning for.</p> <p>It is essential more transit provision is provided. It is good to see this included. But I think it is confusing to refer to transit sites as sites for temporary accommodation needs or emergency stopping places. They are proper sites designed for those who are travelling/ in transit for work, social or any other trip. They are the equivalent of travelodges/ premier inns for the settled population and whilst they can be used for periods of several weeks even months, they are not residential sites and are not expected to provide the facilities of residential sites. For instance, transit sites can rely on communal facilities but most families</p>	

will want their own individual utility blocks and there is no need for space for mobile homes so pitches can be much smaller. But they still need to be suitable for people to live on in locations acceptable for a residential use. You propose 3 transit sites. It might be worth considering if existing private residential sites can offer some transit provision. That way there is on site management and it spreads the provision more widely. I think you will find most private sites operate a quasi transit provision for family members/ visitors.

Do you agree with the proposed plan objectives? Please explain your answer.

These are agreed but this should also list the need to make provision for Transit sites

Do you support the GTAA findings?

These figures should be treated as a minimum figure for three reasons

1-there should be an allowance for the persistent historic failure to meet and deliver the need for pitches in this County

2-I am aware that the study omits some households including the needs of households interviewed after the baseline date of December 2019 .

3- it is likely the assessment by ORS will have underestimated need because.

1-There is no assessment of previous studies and the assumptions relied on. I really do not know how local authorities can properly assess need if they continue to fail to assess and test the assumptions and data of previous studies.

2-as para 2.16 confirms ORS only apply the planning definition to those who travel for work purposes and do not include trips to fairs or any other trips which can have an economic purpose in accordance with the judgments relied on. At appeal the Planning Inspectorate accept trips to the traditional horse fairs as counting towards meeting the planning definition.

3-The low interview rate.

4-The study found that 108 households met the ORS definition of Gypsy Traveller status, 111 did not and 71 were undetermined- which is on the high side (fig 8). ORS assess the Gypsy status of undetermined households at a rate of 30% rather than 49% which is the rate of those who were interviewed. As this is the same population base it makes no sense to apply some arbitrary national figures which until 2018 ORS applied at a rate of 10% and in February 2020 assumed to be just 25% .

The DPD should commit to monitor and review need with updated GTAAs within 5 years.

Do you agree or disagree with the proposal to provide three emergency stopping sites?

I agree with the provision of 3 sites but do not think these should be called emergency stopping places. They should be part of some planned provision and they are not temporary accommodation options, they should be designed for those who are travelling ie transit sites.

Given how many local authorities are disposing of sites and how few transit sites are provided and managed by Council's or have resident wardens to ensure the security / safety of occupants and their possessions, many Travellers are (with good justification) reluctant to use these sites. They are fearful of bumping into households they do not trust or get on with. I urge you to also consider the potential of providing transit provision as part of private sites. I refer you to para 28(b) of PPTS which recognises how many sites will have visitors. In experience most of my clients will only stop with family they know on sites that are safe and secure or on privately provided transit sites provided they know the owner and can be sure there will be other families they know using the site. Also private owners will only agree to accommodate families they know to avoid problems.

Do you agree with the proposed approach to meeting accommodation needs?

I agree with the proposed approach but you need to realise that the reason many families live as extended households is not always from choice but due to the lack of sites. It is important to provide choice of sites by location, ownership and tenure and to ensure new sites are provided for latent need ie those displaced or prevented from returning to live in Wiltshire due to the absence of sites. GTAA's are always unwilling to factor in in-migration yet it is a key component of many housing assessments.. However you need to consider new sites from the outset and not just because the other two options might not deliver enough sites. Without new sites you will fail to provide sufficient choice of sites especially for new young households who want to live independent of parents.

You also need to consider making more social provision for those unable to afford their own sites. The least preferred option of my clients is to rent off a private landowner as this offers no security of tenure, often leads to exploitation (eg increased electricity rates) and caravans on many rented sites are let to non Travellers.

Do you agree with the proposed criteria?

The purpose of CP 47 is agreed. It is especially important that LPAs realise these same criteria should be used to inform site selection/ identification. Given the substantial need in Wiltshire the criteria need to be drafted in a way that will ensure site delivery , not thwart provision.

I disagree with the suggestion that pitches/ sites will only be granted where there is no conflict with other planning policies. That is incredibly unhelpful and simply shows that you have not given this policy sufficient thought. How are Travellers to be expected to select sites and make applications on this basis?. If there are other policies likely to impact on site provision, list them. Do not leave others to guess what you might consider relevant. It is all too easy to find another generic policy on matters as obscure and vague as design, wildlife, sustainability type issues to thwart applications without considering if the harm is significant/ undue or incapable of being outweighed by other material considerations. CP47 should include criteria to address/ require consideration

of all the key issues. There should be no need to consult other additional policies. If you are going to have a GT policy please ensure it is comprehensive so that sites that comply with all these criteria are not at risk of falling foul of some other obscure policy. As Agents we have not got time to waste reading all the various planning policies in different documents to ensure everything is covered. Please do not make this harder than it already is.

Criteria 1

This is not PPTS compliant. PPTS does not require this. I do not believe land last occupied by farmyards would meet the definition of PDL in NPPF. Case law has established there is no onus on applicants to show a better site might exist elsewhere. This would be acceptable only as a criteria for site selection purposes but not for windfall applications

Criteria 2

Acceptable. Some authorities are now asking for vehicle electricity charging points and even cycle storage. I think there is some merit in this but it should not be too prescriptive (for I would have thought this could be retrofitted) and it would require more structures (eg sheds for cycles) on sites.

Criteria 3

Acceptable but I am unclear what is meant by a safe and convenient pedestrian access and hope this is not intended to require there is a pavement leading to/from the site as most sites in rural areas are on roads with no pavements or street lighting.

Criteria 4.

Acceptable but this should read 'supplied with or capable of being connected to ...'

Due to the fact objectors/third parties will often try deny access to services to make life difficult for Travellers and in the hope they will not settle (eg refusing to give way leave consent for electricity connections to poles on land belonging to others and to mains water) it is important that acceptable sites are not refused consent because of such actions. Alternative arrangements are possible eg private water supplies, boreholes, generators. wind turbines/solar panels.

Criteria 5

Acceptable- but more important for sites with multiple pitches. I think it is more important that sites provide adequate space / access for emergency vehicles (eg fire engines) and refuse vehicles (where they need to enter the site).

Criteria 6

Not acceptable. This is not compliant with guidance in PPTS (policy C and para 25). PPTS is supportive of sites in rural areas and only requires that site be close to existing settlements. PPTS does not require those settlements to have a range of local services and facilities. You must have regard to para 103 NPPF. This is a use of land suitable in rural areas. If you are not prepared to make land available in settlements or strategic housing allocations, then do not impose unrealistic criteria for a use that is most likely going to be given a rural location.

You are right to point out that the phrase 'reasonable distance' needs clarification but this is not the test in PPTS. What is reasonable is a factor of range of services/ distance. People will be prepared to travel further to a settlement that offers multiple

services compared to a village with one pub/church. Many Travellers want rural based sites so that they can keep livestock. Sites within 3km of settlements with a range of services are likely to competing with housebuilders and could impose unrealistic constraints on site allocations/ windfall sites. If you do want a distance I think it should be closer to 5 miles. Even in urban areas people think nothing of driving 3km for many services (Supermarkets, town centre functions, hospitals, surgeries, dentists, secondary schools, railway stations). It is not far and you would expect folks in rural areas to have to drive further for services. I had really hoped that this message has been made clear to Wiltshire Planners in appeal decisions. You are a very rural county. You have a high car use. So long as the planning system permits and encourages the conversion of agricultural buildings for dwellings in remote locations there is no justification to impose tight restrictions on GT sites provision.

I think you need to first analyse how far all your existing sites are from settlements with a range of services especially as you promoting the infill/ extension of these sites to meet need. I think you will find quite a few fail your own proposed criteria.

Criteria 7

Acceptable

Criteria 8

Acceptable-but you need to realise this may mean the need for internal walls and fences between pitches

Criteria 9

If I was given the chance to change one part of PPTS it would be the second part of para 25. No one can agree on this. No one knows what it means and because of this it feels like just about every appeal has to address this. We all know this was drafted to refer the likes of Dale Farm Basildon or Cottenham in South Cambs where huge sites were allowed to develop. But it is used far too often to reject applications. This is such a tricky criteria and it seems most councils have no idea how to address it-yet include it in criteria policies and reasons to reject a substantial number of cases.

If it is to be included I do not think it should refer to character as surely that is an aspect of criteria 7. It should be about scale of development and I think you need to provide some guidance because objectors will always take issue with this.

First you need to be able to define what the nearest settled community is-many authorities can not even agree on this. Are half a dozen houses a settlement? Do you include dispersed housing with a small hamlet? Is an existing Gypsy Traveller site with say 20/25 pitches a settlement? It is quite shocking how some local authorities have addressed this. The worst example I have come across was probably by Chichester Council who deliberately ignored some housing to substantiate their case . More recently South Downs NP tried to argue that only the historic core of a village mattered, not the rest of the settlement, in order to claim the impact of 2 extra pitches on a pre existing site was greater.

You also need to be clear how any new development will affect the settled community. It can not simply be that there are too many Traveller pitches in an area. The concern must clearly manifest itself in some way based on size and proximity and you need to be clear how you are going to assess this. No one would ever dare argue that 2 new infill homes in a hamlet would outweigh/ dominate an existing cluster of say 5/6 homes. So why do people think the equivalent of Traveller sites would?

As you propose to intensify / extend existing sites you need to decide if permanent pitches are part of the settled community because it is apparent some Councils do not. I am very worried by the statement on p4 that Travellers history, heritage etc 'distinguish them from settled communities'. Historically maybe-but not now. The thrust of Government policy has been to encourage families to settle and become part of local communities. Many ethnic travellers live in housing. Indeed it would be fair to say the majority now do. If we do not treat residential sites as part of the settled community, if we continue to regard them as something different, how will planners ever encourage the integration and peaceful co existence of Travellers? So when you assess scale is it cumulative? Is it for the development proposed or the cumulative number of in combination with existing pitches (some of which may well predate this guidance in PPTS) and that impact on an existing settlement. As you propose to look at scope to make better use of existing sites I think there is implicit assumptions that you regard them as existing and part of the settled community. But you need to make your approach clear.

You also need to be clear how an assessment of the effects on the settled community is to be approached. Is this based on the number of pitches v houses, an increase in population, the size of the site relative to the nearest settled community or concerns about overloading existing infrastructure (something I have never seen argued successfully at appeal).

As I say-this criteria is fraught with problems and I am weary of contesting this at appeal. So before you include this criteria think how your development management planners will deal with this at appeal. If possible give an example of when it might be of concern eg a proposal for a 15 pitch site within 0.25 km of a hamlet of just 6 houses.

Criteria 10

This needs to be reworded. It should surely read not compromise the purposes of designation of national or international designations and it is unreasonable to require no adverse effect on other matters as any new development is going to have some impact. This should surely read no significantly or undue adverse effect incapable of mitigation. Otherwise the slightest adverse impact would offend the criteria as drafted and I have seen Council's try and argue that loss of an ordinary field grazed closely by livestock adversely affects biodiversity when it is clear the field had no special biodiversity value in the first place.

Do you agree with the proposed selection criteria for emergency stopping sites?

It is really not clear what you mean by emergency stopping sites. I think you need to explain. If there is proper provision for transit sites there should be no need for ESS.

1-Unclear and too vague. Given you only propose 3 transit sites/ESS surely there is no need to site in local / national designation. There is no need to avoid contaminated land if the harm can be addressed/ overcome. The wording needs to be much clearer. I think you need to ensure sites are not in areas affected unduly by noise. It is all too easy to presume Transit sites can be next to main roads/ motorways on land no one else would build on. Families will be living in caravans on these sites and they need to be suitable for residential uses.

2-What are these space standards? Why is this important for ESS and not residential sites?

3-agree in principle but I am not clear what those routes are. Any main road is likely to be a key travelling corridor/ route. It is not the purpose of the GTAA to identify these. You are only seeking to identify 3 sites. I think you should be able to indicate approximately where they will be sited. Most Travellers want access to main urban centres for work unless passing through the County but sites on the strategic road network are to be preferred.

4-Agreed

5- Agreed but trailers are not heavy vehicles.

6-Agreed. Sites should not be in industrial/ commercial areas as this is a residential use.

7-Ok but a bit over prescriptive. You are not exactly promising deliver major development. Any loss of agricultural land would be v small.

8-agree

9-Agree.

I think you should indicate the likely size of transit sites and scope to include as part of private sites.

I think you should refer to CLG guidance 2008. There is a need for more than just toilets. Proper bathroom facilities are needed e.g. showers, launderettes etc. You need to consider lighting, security, warden accommodation and maybe even room for animals e.g. grazing land for horses etc.

Families will end up living on these sites so ideally they should include amenity areas.

Further comments

CALL FOR SITES

Consideration should be given to the capacity of all existing sites, sites the subject of current planning applications and unauthorised developments.

The Council should consider carefully the condition of sites and whether they are fit for purpose. It is not always the case that council/ private sites are suitable without significant refurbishment.

The historic failure of Wiltshire CC to compile, submit and adopt a site allocation DPD is grounds to reconsider all sites previously dismissed on appeal, especially where they are still owned by Travellers.

There is a need for a more flexible approach to site provision given the failure to require provision as part of strategic housing allocations and the difficulties encountered with this approach in other parts of the country.

Rep ID: 45	
Consultee code: Neighbouring Authority	Consultee Organisation (if applicable): South Somerset District Council
Is this response on behalf of someone else/another organisation? No	
Organisation being represented (if applicable):	
Does this representation refer to attachment(s): no	If this representation refers to attachment(s), these are listed below:
Do you have any comments on what the plan should contain?	
<p>The scope as the plan as set out in the document seems sensible and in accordance with the Planning Policy for Traveller Sites, 2015.</p> <p>Whilst it is recognised that this is a consultation document it may benefit from a section setting out how the travelling communities will be engaged in the site identification process going forward?</p>	
Do you agree with the proposed plan objectives? Please explain your answer.	
<p>Yes. The objectives identified should result in a policy compliant development plan document which will address the needs of the travelling communities.</p> <p>It is suggested that Objective 1 includes reference to the fact that the allocations and broad locations for growth will be through a DPD.</p> <p>Objective 3 may benefit from a specific reference to health and education facilities.</p>	

Do you support the GTAA findings?
<p>The GTAA has been carried out by respected consultants who are experienced in this area of work – we have no reason to doubt their findings.</p> <p>In accordance with the Duty to Co-operate consultation with South Somerset District Council as an adjoining authority has taken place and no significant cross-boundary issues have been identified.</p>
Do you agree or disagree with the proposal to provide three emergency stopping sites?
<p>This is in accordance with the findings of the GTAA therefore South Somerset District Council has no reason to disagree.</p>
Do you agree with the proposed approach to meeting accommodation needs?
<p>Yes. The proposed approach to meeting accommodation needs appears logical. It seeks to maximise the use of the land already in use for Gypsy and Traveller accommodation and therefore will help to reduce the number of new sites that need to be found.</p>
Do you agree with the proposed criteria?
<p>Yes. The criteria identified for the location for permanent sites are considered to be compliant with Planning Policy for Traveller Sites, 2015.</p> <p>Interested to note criterion vi. - access to health care and education are vital.</p>
Do you agree with the proposed selection criteria for emergency stopping sites?
<p>Yes, the proposed criteria for the selection of emergency stopping places seem reasonable in the context of identifying sites that are accessible to the strategic road network and maintain the health and safety of all road users.</p> <p>The wording of criterion ix. seems a little awkwardly worded – does it mean the availability and deliverability of the site i.e. the speed and ease with which it can be delivered?</p>

Further comments

We look forward to on-going engagement through the Duty to Co-operate process as work progresses and when any permanent sites or emergency stopping places are identified as being potential site allocations.

Attachment G&T_17



Sent by email to:
spatialplanningpolicy@wiltshire.gov.uk

 thameswaterplanningpolicy@savills.com

 0118 9520 500

1st March 2021

Wiltshire: Local Plan Review – Gypsy and Travellers Regulation 18 Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.

As you are aware, Thames Water covers the North East of the Wiltshire and are hence a "specific consultation body" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

Water and Wastewater/Sewerage Infrastructure

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of sewerage/wastewater treatment and water supply infrastructure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."

Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."

Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary..."

The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).

Registered address: Thames Water Utilities Limited, Clearwater Court, Vastern Road, Reading RG1 8DB
Company number 02366661 Thames Water Utilities Limited is part of the Thames Water Plc group. VAT registration no GB 537-4569-15

It is important to consider the net increase in wastewater and water supply demand to serve the development and also any impact that developments may have off site, further down the network. The Neighbourhood Plan should therefore seek to ensure that there is adequate wastewater[and water supply infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The economic regulator Ofwat has published new rules, which set out that charges should reflect: fairness and affordability; environmental protection; stability and predictability; and transparency and customer-focused service.

The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <https://www.thameswater.co.uk/preplanning>

In light of the above comments and Government guidance we consider that the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage [and water supply] infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Neighbourhood Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”

Comments in relation to Water Efficiency/Climate Change:

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 58-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Proposed policy text:

“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”

Flood Risk, Sustainable Drainage Systems and Water Management

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."***

Comments on Site Allocations

The information contained within the new Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.

The majority of the proposed sites fall outside on the Thames Water area.

For any sites that fall within Thames water's area, we recommend Developers contact Thames Water to discuss their development proposals by using our pre app service (link below) <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the number above if you have any queries.

Yours faithfully

Thames Water Utilities Ltd

Attachment G&T_19



Cranborne Chase Area of Outstanding Natural Beauty



AONB Office, Rushmore Farm, Tinkley Bottom, Tollard Royal, Salisbury SP5 5QA
Tel: 01725 517417 info@cranbornechase.org.uk www.cranbornechase.org.uk

Spatial Planning Team
Economic Development and Planning,
Wiltshire Council,
County Hall,
Trowbridge,
BA14 8JQ.

By email: spatialplanningpolicy@wiltshire.gov.uk

2nd March 2021

Dear Spatial Planning Team

Wiltshire Gypsy and Traveller Communities Consultation

Thank you for the opportunity for the AONB Partnership to respond to your consultation.

1. The constitution of this AONB's Partnership is set out in Annex A and the status and importance of AONBs in general, and in this AONB in particular, are set out in Annex B.
2. This consultation response has been prepared under delegated authority.
3. I see that the Consultation is the first step in developing a plan to identify accommodation needs for travellers to 2036. The objectives set out on page 7 appear to be well intentioned, reasonable, and appropriate.
4. The AONB is not in a position to comment on the findings of your Gypsy and Traveller Accommodation Assessment. Nevertheless, it does recognise that there are needs for more or less permanent accommodation, albeit allowing for periods of travelling, and the separate category of 'emergency' stopping sites. I have often seen these referred to as 'transit' sites for occupation over short periods when travellers are predominantly in travelling mode.
5. It seems to make sense to have a small number of these emergency sites distributed across the County and associated with major transit routes. Three such sites, north, west, and south, seem to be appropriate.

International Dark Sky Reserve 2019

6. The approach to provision by intensifying use on existing lawful sites and regularising unauthorised sites where appropriate also seems preferable to establishing completely new Brownfield or Greenfield sites.
7. Clearly Gypsies, travellers or travelling show people do not need or require a site with an AONB location. I see that this is acknowledged in the criteria set out on pages 12 and 13 where criterion x) indicates that location or establishment of a site should not compromise a nationally recognised designation. The AONB is, of course, a national designation. Similarly, I see on page 14 relating to criteria for emergency stopping places, i) is that such places should avoid any adverse impact on local/national designations.
8. This AONB Partnership concludes that your approach to the plan preparation seems appropriate and, subject to the criteria relating to avoiding impacts on national designations, this AONB is happy to **support** your approach to the plan preparation.

I hope these comments are helpful to you.

Yours sincerely



Principal Landscape and Planning Officer (part-time Monday to Wednesday)

For and on behalf of the Cranborne Chase AONB Partnership Board



ENCS: Annex A AONB Partnership Structure
 Annex B AONB Status and Significance

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Cranborne Chase

Area of Outstanding Natural Beauty

Cranborne Chase Area of Outstanding Natural Beauty

AONB Office, Rushmore Farm, Tinkley Bottom, Tollard Royal, Salisbury SP5 5QA

Tel No: 01725 517417

Email: info@cranbornechase.org.uk

The Cranborne Chase

Area of Outstanding Natural Beauty Partnership Board

is made up of the following Partner Organisations

Unitary, County, and District Council Membership (1 Member and 1 Officer Representative each)

- Wiltshire Council (Wef.01.04.09 incorporating Wiltshire County Council, West Wiltshire District Council, and Salisbury District Council).
- Dorset Council (Wef 01/04/19 incorporating Dorset County Council, East Dorset District Council, and North Dorset District Council).
- Hampshire County Council
- Somerset County Council
- New Forest District Council
- Mendip District Council
- South Somerset District Council

Other Organisations

- Natural England (2 Representatives)
- Historic England (1 Representative)
- Campaign to Protect Rural England (1 Representative)
- Cranborne Chase Landscape Trust (1 Representative)
- Forestry Commission (1 Representative)
- The Country Land and Business Association (1 Representative)
- National Farmers Union (2 Representatives)
- Community Representatives from the Wiltshire and Dorset Associations of Town & Parish Councils (ATPCs) (2 Representatives)

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Annex B

AONB status and significance

The Cranborne Chase and West Wiltshire Downs AONB is nationally important. It has been designated under the National Parks and Access to the Countryside Act 1949 to conserve and enhance the outstanding natural beauty of this area which straddles two County, two county scale Unitary, and three District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage.

It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage assets and environmental capital.

Local government (including planning authorities), Ministers of the Crown, individual councillors, any public body and their employees, statutory undertakers, and holders of public office also have a statutory duty in section 85 of the CRoW Act to have regard to the purposes of AONB designation, namely conserving and enhancing natural beauty, in exercising or performing any functions in relation to, or so as to affect, land in an AONB.

This [AONB's Management Plan](#) is a statutory document that is approved by the Secretary of State and is adopted by the constituent councils. It sets out the Local Authorities' Objectives and Policies for this nationally significant area, as required by section 89 (2) of the CRoW Act. The national Planning Practice Guidance [Natural Environment paragraph 040, (21.07.2019)] confirms that the AONB and its Management Plan are material considerations in planning.

The National Planning Policy Framework (2019) is clear that the 'presumption in favour of sustainable development' does not automatically apply within AONBs, as confirmed by paragraph 11 footnote 6, due to other policies relating to AONBs elsewhere within the Framework. Paragraph 11 (b) indicates that for plan-making being in an AONB 'provides a strong reason for restricting the overall scale, type or distribution of development.' It also indicates in 11 (d) that for decision-making the application of policies in the NPPF that protect areas such as AONBs 'provides a clear reason for refusing the development proposed'.

NPPF paragraph 170 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, which include AONBs, in a manner commensurate with their statutory status. AONBs, along with National Parks, have the highest level of national protection.

Paragraph 171 explains that plans should distinguish between the hierarchy of international, national and local sites whilst taking a strategic approach to enhancing habitats and green infrastructure, and planning for the enhancement of natural capital across local authority boundaries.

It is explicit (paragraph 172) that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty. The conservation and

International Dark Sky Reserve 2019

enhancement of wildlife and cultural heritage are important considerations in these areas. Furthermore, the scale and extent of development within these designated areas should be limited and planning permission should be refused for major development other than in exceptional circumstances.

The Planning Practice Guidance, updated 21.07.2019, helpfully includes landscapes, environmental gain, Areas of Outstanding Natural Beauty, and their settings in the Natural Environment section. In particular, paragraph 042 highlights the importance of settings, their contributions to natural beauty, and the harm that can be done by poorly located or designed development especially where long views from or to the AONB are identified. Paragraph 041 is clear that policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for development, and any development in an AONB will need to be located and designed in a way that reflects its status as a landscape of the highest quality.

More detailed information in connection with AONB matters can be found on the AONB [web site](#) where there is not only the adopted AONB Management Plan but also Position Statements and Good Practice Notes ([Planning Related Publications](#)). In particular when considering construction within the AONB I would draw attention to our [Good Practice Note on Colour in the Countryside](#)

This AONB is, as I expect you know, in one of the darkest parts of Southern England and hence the visibility of stars, and the Milky Way, is a key attribute of this AONB. In October 2019 it was designated the [14th International Dark Sky Reserve](#) in the world. The AONB Partnership is, therefore, very concerned about light pollution. Development that could contribute to light pollution, and hence impact adversely on those dark night skies, has to be modified so that such impacts are eliminated. Building designs, especially those with extensive areas of glazing, may need to be amended. Any external lighting should be explicitly approved by the Local Planning Authority and comply with the [AONB's Position Statement on Light Pollution](#) and the more recent [Good Practice Note on Good External Lighting](#) and [Paper by Bob Mizon on Light Fittings](#).

Greater details of the landscape, buildings and settlement characteristics can be found in the [Landscape Character Assessment 2003](#) and the [Cranborne Chase and Chalke Valley LCA 2018](#). Those documents are available and can be viewed in [FULL](#) on our [web site](#).



International Dark Sky Reserve 2019

Attachment G&T_20



Spatial Planning
Wiltshire Council

Via email: spatialplanningpolicy@wiltshire.gov.uk

[REDACTED]
Highways England
Brunel House
930 Aztec West
Bristol
BS32 4SR

[REDACTED]

4th March 2021

Dear Spatial Planning Team,

THE WILTSHIRE LOCAL PLAN AND GYPSIES AND TRAVELLERS PLAN CONSULTATIONS

Highways England welcomes the opportunity to comment on the Wiltshire Local Plan and Gypsies and Travellers Plan. As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises parts of the M4, A303, A36 and A419. It is on the basis of these responsibilities that the comments that follow in this letter have been made.

Highways England is keen to ensure that transport and land use planning policy is closely integrated and that the network is able to deliver sustainable economic growth. In this respect, Highways England draws your attention to "The Strategic Road Network - Planning For The Future - A Guide To Working With Highways England On Planning Matters", Highways England's Licence issued by DfT and DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.

We are interested in the potential traffic impacts of any development site proposals and/or policies coming forward through the Local Plan process and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any improvements needed to deliver aspirations at this early stage, as set out in Government policy.

Paragraph 12 of Circular 02/2013 states that *'The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.'*

Paragraph 15 states that *'In order to develop a robust transport evidence base [for local plans], the Agency (now Highways England) will work with the local authority to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety.'*



Paragraph 18 states that *'Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. The Highways Agency (now Highways England) will work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.'*

Responses to Local Plan consultations are also guided by other pertinent policy and guidance, namely the MHCLG National Planning Policy Framework (NPPF), DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development, and in our guide The Strategic Road Network – Planning for the Future.

The NPPF sets out that plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and statutory consultees. (para 16).

Transport issues should be considered from the earliest stages of plan-making and development proposals so that the potential impact of development on transport networks can be addressed. (para 102).

The planning system should actively manage patterns of growth such that significant development is focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. (para 103).

Planning policies should be prepared with the active involvement of highways authorities and other transport infrastructure providers so that strategies and investments for supporting sustainable transport and development patterns are aligned. (para 104).

Planning policies and decisions should support development that makes efficient use of land, taking into account the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use. (para 122).

In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. (para 109).

Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (including transport). Such policies should not undermine the deliverability of the plan. (para 34).

In summary; as a minimum, in order for the transport evidence base to satisfy the requirements of NPPF and Circular 02/2013, it is necessary to establish:

- The transport impacts of the development allocations.
- The improvements necessary to ensure that the impacts are not severe.
- Any land required for the delivery of the necessary improvements
- The cost of the necessary improvements.

- Any other deliverability constraints.

Paragraphs 9 and 10 set out the approach that Highways England takes in relation to development proposals as follows:

“9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

10. However, even where proposals would not result in capacity issues, the Highways England’s prime consideration will be the continued safe operation of its network”.

Applying the principals of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, i.e. a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact. In order to establish whether a section of the SRN has a severe impact, an assessment of additional traffic on the SRN as a result of the development proposals will be necessary, and agreement should be sought on the best way to establish whether the additional traffic constitutes a severe impact.

EMERGING SPATIAL STRATEGY

This consultation discusses the provision of housing and employment in Wiltshire to 2036 and where demand needs to be satisfied. The emerging strategy plans for a further 18,000 homes in addition to current commitments and allocations. At para 3.22 the link between the scale of growth and the need to consider the impact of this growth on transport is made, with growth at Chippenham, Salisbury and Trowbridge specifically mentioned. The A36, passes through Salisbury and M4 Junction 17 is closely related to Chippenham and connects the A350 to the M4 motorway.

Alternative development strategies have been identified and tested through a sustainability appraisal, and preferred and potential development sites identified. In the Principal Settlements of Chippenham, Salisbury and Trowbridge, preferred development sites have been identified. In the Market Towns, of which the following are of particular interest to Highways England (Amesbury, Royal Wootton Bassett and Warminster), potential development sites have been identified. The preferred and potential sites have been reviewed below, if other sites were to come forward, it is noted that additional issues may arise.

Chippenham

The amount of proposed development at Chippenham is substantial. Though the town is located about 3 miles south of M4 J17, it is acknowledged that additional development at Chippenham alongside new local road infrastructure will impact on the motorway junction. Work has been ongoing with Wiltshire Council to assess the impacts under various scenarios and identify a comprehensive

scheme that can accommodate the additional growth. The preferred development sites are predominantly located to the east and south of Chippenham.

The review of transport issues in the Principal Settlement report is limited to highlighting key issues. Transport issues are described in more detail in the Transport Review (January 2021) report, which is discussed below. Given the scale of proposed development, it will be critical to understand and secure development phasing in relation to the provision of necessary new road infrastructure.

Royal Wootton Bassett

For the Swindon Housing Area, a potentially significant level of development at Royal Wootton Bassett has been proposed. The Emerging Spatial Strategy notes that there are potentially significant obstacles to overcome if growth is to be successfully delivered at Royal Wootton Bassett, notably managing the traffic that new homes will generate both within the town and at M4 junction 16. The Royal Wootton Bassett Market Town document notes the potential impacts at M4 J16 and the issue of noise at two of the proposed development sites which abut the M4. The Transport Review report makes little reference to Royal Wootton Bassett and any impacts of this development. We would welcome information on what the transport challenges are likely to be and how it is proposed that these will be mitigated.

Salisbury

For the Salisbury HMA, there is no explicit mention of the A36 or the A303 in the main Emerging Spatial Strategy document. However, in the Salisbury Principal Settlement document, settlement profile table, the Transport section highlights the benefits of the A36 as a route that avoids the city centre, but also notes that the A36 acts as a barrier to walking and cycling movement. The table notes under Opportunities that there is the possibility of major road funding and A36 junction upgrades. No further information is provided. It would be helpful to understand more about what is envisaged for the A36 beyond the Major Road Network (MRN) proposals, on which we are already engaged.

There is one preferred development site adjacent to the A36, Land at Quidhampton Quarry. Highways England notes that quarry operations ceased over a decade ago and the site has not been in active use. We have significant concerns about the existing site access arrangements and further consideration regarding safe and suitable access for any proposed future use will be necessary for the site to be deliverable.

Amesbury

Also in the Salisbury HMA is Amesbury. The Amesbury Market Town document notes that two of the three potential selected sites abut the A303 and there could be noise and air quality issues, which will need to be mitigated alongside any other impacts on the integrity of the asset. The priorities highlighted for the area include improved infrastructure and transport, particularly relating to the A303 and A345 (both of which currently experience congestion) to improve linkages to and from the town. The construction of the A303 Stonehenge scheme may offer some relief to the issues identified. It would be helpful to be aware what other, if any improvements, are also considered necessary.

It is assumed that both sites would be accessed from the local road network and not the A303. Highways England would welcome clarification of this within the emerging strategy.

Warminster

In the Trowbridge HMA, Warminster is identified as a Market Town. The A36 bypasses Warminster and currently forms a boundary to the built-up area. Two of potential development sites identified for Warminster about the A36. In the review of Site 4: Land at Warminster Common and Land south of Wren Close, Warminster, the issue of noise and air quality arising from proximity to the A36 is recognised. We will seek a suitable buffer between the road and any new development. In the review of Site 8: Land at Brick Hill and Land between Bath Road and A36, noise and air quality are not mentioned, but as with Site 4, the issues equally apply. Further consideration will also need to be given to any other impacts on the integrity of the infrastructure asset including drainage and landscape.

Overall, the Warminster Market Town document recognises that potential impacts on the A36 will need to be assessed. There is no specific reference to impacts on the A36 at Warminster in the Transport Review report, hence we would encourage the transport review work to include an assessment of the A36 at Warminster.

It is assumed that both sites would be accessed off the local road network, not the A36. Highways England would welcome clarification of this within the emerging strategy.

Wiltshire Local Plan – Transport Review (January 2021)

To support the assessment the Emerging Spatial Strategy, a Transport Review report has been produced by Atkins on behalf of Wiltshire Council. This report considers existing traffic conditions, sets out how future development and planned transport improvements schemes have been added to the network and sets out a high level assessment of the impact of the proposed growth and whether further mitigation is required. The focus of this report has been Chippenham and Salisbury, with limited reference to other locations for development in Wiltshire.

The report notes that the assessment has been undertaken using the Wiltshire strategic model, which has a 2018 base. Highways England has been engaged on the production of the base year for this model, which is based upon the Highways England Regional Transport Model. We accept this model as an appropriate base for the assessment of the local plan impacts.

Section 2 of the report sets out the model scenarios for the assessment of the proposed growth. The principle of the scenario structure is reasonable, but we note that some of the schemes that are proposed to be included in the 2036 Do Minimum scenario are substantial schemes that are currently the subject of Government funding bids and as such are not yet guaranteed. Hence, there is a risk that if these bids are not successful, the basis of the assessment will have changed.

The forecasting of trip demand from the proposed allocations has utilised trip rates from the TRICS database. This provides a good clarity on the rates being used. It is assumed that rates contained in Table 2-2 of the report are vehicle per dwelling rates. Confirmation of this would be welcomed.

Section 2.3 lists the Do-Nothing and Do-Minimum infrastructure assumptions. These are considerable, and assuming delivery of some of the schemes carries some risk. Hence, we assume that the schemes included in the modelling assessment will also be included in the relevant development allocation policies as necessary prior to commencement of new development. If this is not the case, it would be helpful to understand what phasing would be assumed and what measures would be taken if the development were to advance ahead of the delivery of infrastructure. It is

suggested within the report that the A303 Stonehenge (Amesbury to Berwick Down) improvement been assumed in the Do Nothing and/or Do Minimum scenario. Further clarification would be welcome in this regard.

Section 2 contains various plots of data from the Wiltshire SATURN model. As we are aware that in its original form the South West Regional Transport Model is a peak period model, we note that the various plots refer to AM peak period (08:00-09:00). We assume that this means that the model used for the assessment is a peak hour model, but clarification would be helpful. The distinction between peak period and peak hour is important when considering a suitable threshold to identify a severe or unacceptable impact.

Section 3 of the report considers the mitigation of the Local Plan. The hierarchy is taken from the Wiltshire Local Transport Plan, which considers walking and cycling measures first, then public transport and then highway interventions as a last step. We are content with this approach, but expect that any alterations made to the highway impact analysis using the traffic model will be clearly stated and evidence provided to substantiate any mode transfers.

It is noted in the report and its appendices that standard methodologies have been used to assess the likely modal shift from car based trips to walk/cycle and public transport. Use of standard methodologies is welcome. A summary, how the location of the non-home end of the journey is taken into consideration. For the SRN, it is longer distance bus journey and rail journeys that could offer an alternative to using the SRN, but it is only appropriate to forecast a transfer of mode when the destination location of the journey is also within reasonable distance of the public transport interchange point and the journey is not convoluted (i.e. involving many changes which in reality may not be coordinated resulting in long journey times).

Section 4 of the report provides some conclusions and a summary. In reviewing the potential impacts without mitigation, M4 Junction 17 is specifically mentioned as a pinch-point. Hence, we are particularly interested in working with Wiltshire Council going forward to better understand the assessment undertaken and to identify appropriate mitigation.

The promotion of active modes is welcome from a wider sustainability and health point of view. Unfortunately for the operation SRN, however, journeys taking place on the SRN tend not to be those that can be readily undertaken by walking and cycling. Hence, our interest in these local trips is more focussed on accepting the way in which these are identified and quantified, so that we can be comfortable that the appropriate proportion of short and longer distance trips have been calculated as arising from the proposed allocations.

We have commented on the opportunities that public transport, primarily rail, can offer as an alternative to using the SRN. We have also noted that there needs to be careful consideration of the whole journey in order to be confident that it is realistic to assume a transfer of mode could realistically take place. In section 4.2.2, the uncertainty of future public transport networks and utilisation of services following the Covid-19 pandemic is described. We acknowledge this uncertainty, and agree that further work is necessary to be confident regarding the take up and indeed availability of public transport services going forward.

The highway impacts and mitigation are summarised in section 4.2.3. As previously mentioned, the report describes a number of substantial road schemes that have been identified as necessary to accommodate the envisaged growth. These are at various stages of feasibility and design, and some are the subject of funding bids to Government. There is also a need to secure planning permission



and other licenses to allow their implementation. As the combination of schemes has been shown to impact on the SRN, we are interested in understanding how the delivery of the schemes will relate to the delivery of the proposed allocations in the plan and how the delivery of the development allocations will be regulated to ensure that the necessary infrastructure is delivered alongside or in advance of the development. It is noted that the report states that a Major Road Network scheme has been developed for M4 Junction 17. We have been working with the Council on this scheme and will continue to do so to further refine the scheme through the detailed design processes.

Section 4.4 sets out some recommended next steps and locations for further investigation. We note that this specifically includes further assessment of the Market Towns, which we have noted in this letter as currently absent. We therefore look forward to building on our regular engagement with Wiltshire Council regarding the development of the transport evidence base.

PLANNING FOR WILTSHIRE'S GYPSY AND TRAVELLER COMMUNITIES – CONSULTATION

This consultation sets out the Council's proposed approach to addressing the accommodation needs of the Gypsy and Traveller communities in Wiltshire to 2036.

Highways England is satisfied with the broad scope of the consultation document and the three objectives, particularly objective 3 which seeks to ensure sites are appropriate and sustainable with regards to access.

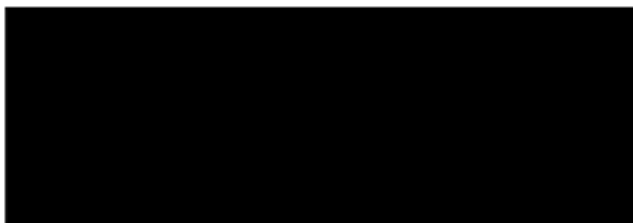
The consultation document outlines the approach to identifying sites, which appears to be reasonable, as well as the proposed assessment criteria for both permanent and emergency stopping sites. Highways England welcomes the inclusion of assessment criteria related to ensuring the sites do not result in a detrimental impact on the safe operation of the SRN and are served by safe vehicular access. However, it may be beneficial to both the local and strategic highway authorities for the criteria wording to better reflect the requirements of NPPF and outline that vehicular access should be safe and suitable for all users and that the proposed development does not result in an unacceptable impact on highway safety.

We also welcome the inclusion within the assessment criteria of site servicing considerations, particularly with regards to drainage and water disposal, which should help to address unauthorised connections for any site in proximity to the SRN.

Highways England requests that as potential sites are identified we continue to be engaged by the Council to help determine any potential impacts on the SRN and the site's suitability against the identified assessment criteria.

We trust that our response will be helpful and assist you with preparing your Local Plan. If you require further clarification on any issues, please do not hesitate to contact me.

Yours sincerely



Attachment G&T_27

Particular comments have been made against Questions 1 to 7. Further comments on Consultation Document are included in Question 8.

Response to consultation on Gypsies and Travellers Development Plan Document - Regulation 18 stage [needs to be submitted by March 9 2021]

The Council is preparing a specific single-issue Development Plan Document to address the accommodation needs of Wiltshire's travelling communities and to update Core Policy 47 of the Wiltshire Core Strategy which deals with the accommodation needs of gypsies and travellers.

The Council agreed in October 2020 to undertake public consultation on the scope of the specific DPD for travelling communities. To that end, it has published an initial consultation document as the first stage of preparing it.

The Council's October 2020 Cabinet report (paragraph no.5) highlights that preparing a specific DPD for travelling communities will enable the Council to identify the accommodation needs of travellers to 2036 and to make provision through site allocations and an up to date planning policy.

Importantly, the report notes (in paragraph no. 14) that a 'call for sites' will be undertaken to identify opportunities for sites for travellers. This is welcome as sites may come forward that are more suitable than the existing sites (either as they are or with more intensified development).

The scope of the DPD as set out in the current consultation document is supported as it is helpful that this topic is addressed through a robust and up to date planning policy framework given :

*the challenges of identifying accommodation needs and suitable locations; and

*providing a rigorous set of criteria for the determination of planning applications for sites for the traveller community.

The planning system in this country is based on a plan-led approach and a specific DPD that has been through the necessary statutory scrutiny will accord with that.

Objective 1 in the consultation document deals with the issue of meeting identified accommodation needs. The DPD must be based on an up to date and robust accommodation needs assessment. The GTAA survey dates from late 2019 and it will be important to ensure that the survey remains valid and appropriate throughout the programme for preparing the DPD. The GTAA should be refreshed ahead of the Local Plan Examination for the DPD so that the Inspector can be certain that the evidence base is robust and up to date.

Objective 3 deals with site location and refers to 'provide well designed sites in keeping with their surroundings, and in appropriate and sustainable locations with good access to facilities and services; which respect both the interests of the settled and traveller communities. The commitment to maintaining the interests of the settled community is strongly supported and this will be most readily achieved if any site allocations focus on locating sites well away from established bricks and mortar accommodation occupied by the settled (non-travelling) community rather than proposing / allocating sites adjoining existing homes.

There should be a clear commitment to the DPD including robust criteria for the determination of any planning applications for sites for the travelling communities so as to ensure that the amenity of the existing settled community is safeguarded and that the communities within such sites are able to have an appropriate residential environment.

No specific comments are made in this response on the findings in the GTAA report given the highly specialised nature of this work. The formal scrutiny of the DPD by a

Local Plan Inspector and other stakeholders will examine the findings in detail.

The GTAA proposes that three sites are provided for emergency stopping and suggests broad locations for these (north, west and south Wiltshire). The DPD should consider very carefully how many pitches are required having regard to the significant fluctuations in the numbers of unauthorised encampments across 2016-2019 to ensure that other land use requirements can be satisfactorily addressed and to avoid other land and activities being blighted.

The proposed approach to meeting identified accommodation needs includes a focus on intensifying the accommodation on existing sites. It is essential that the DPD clearly set out the Council's commitment to safeguarding the amenity of the settled community in this approach. As set out in the consultation document, it would appear that the focus of the DPD will be very much on addressing the needs arising from the GTAA when a more balanced approach is needed that takes account of interests across the whole community.

The DPD supporting documents should clearly evidence how each individual allocated site will be configured to accommodate the needs of the traveller communities within those sites and how adjoining occupiers and uses will be protected. Information should be provided for each site to show the accommodation being provided and how it will be arranged within the site. Comprehensive information should be prepared to illustrate how boundaries will be treated and how sites will be provided with necessary services. This information should be prepared for individual sites on a comprehensive basis and published at each of the further stages in the preparation of the Local Plan (Regulation 19 and formal submission to the Planning Inspectorate). Confirmation should be secured from the traveller community on each site that the layout and accommodation proposed on each proposed site allocation meets their requirements and is deliverable. It should include a degree of flexibility to encompass any changes over the period of the plan.

Figure 3 is informative in so far as it identifies the key decision points in the process but it should be revised to include the points above.

The proposed site assessment criteria for permanent sites should be consistent with the requirements set out in national planning policy - specifically, 'Planning Policy for Traveller Sites (2015)'.

The respondent [REDACTED] wishes to be added to the consultation database for both the Local Plan review and the Gypsies and Traveller DPD. The respondent wishes to be advised of all future consultation(s) on the preparation of the Gypsies and Traveller DPD.

It is a serious oversight that the consultation arrangements for the Gypsies and Travellers DPD (as set out in the October 2020 Cabinet report in paragraph no. 15) make no reference or commitment to notifying residents in the settled community who adjoin existing gypsy and traveller sites about the preparation of the specific Gypsies and Travellers DPD nor their opportunity to engage in this initiative. This is a significant given the planning sensitivities that are often in place where such sites are in close proximity to the settled community. An area mailshot is not sufficient for those immediately adjoining the sites.

Furthermore, paragraph no. 16 of the Cabinet report draws attention to the difficulties caused by undertaking consultation on the emerging DPD during the Covid pandemic - specifically, that consultation material will not be viewable at Council offices and libraries in the interests of public safety.

The Council should carefully consider if the public consultation on the early stages of the preparation of this important DPD has been satisfactory in the light of these two issues. It would be unfortunate if these shortcomings were exposed at the Examination into the DPD such that further work has to be done which would delay its adoption.

Gypsies and Travellers Development Plan Document Consultation Report

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